

Chapter 8. RESPONSES TO COMMENTS REGARDING THE PROPOSED PROJECT

This chapter sets forth the California Department of Fish and Game's (Department) responses to comments regarding the "Draft Environment Document, Marine Protected Areas in NOAA's Channel Islands National Marine Sanctuary," dated April 2002 (Draft ED). [See generally Cal. Code Regs., tit. 14, Section 781.5, subds. (c), (h); Pub. Resources Code, Section 21080.5, subd. (d)(2)(D)]. The Department, on behalf of the Fish and Game Commission (Commission) as the lead agency for the proposed project under the California Environmental Quality Act (CEQA) (Pub. Resources Code, Section 21000 et seq.), released the Draft ED for public review and comment on May 30, 2002. The Department provided public notice of the availability of the Draft ED for public review and comment at the same time and made copies of the document available for review by interested public agencies and members of the public at a number of locations, including the Commission's office in Sacramento and Department offices in Sacramento, Redding, Yountville, Rancho Cordova, Fresno, Los Alamitos, San Diego, Santa Barbara, Morro Bay, Monterey, Menlo Park, Bodega Bay, Fort Bragg, and Eureka. The Department also submitted the Draft ED to the State Clearinghouse at the Governor's Office of Planning and Research, provided copies to County libraries in areas of the State that may be affected by the proposed project, and made the document available via the Department's Marine Region web site. Consistent with the notice of availability of the Draft ED, the Department and Commission accepted all written comments regarding the proposed project and Draft ED received before 5:00 p.m., on July 15, 2002, at the Commission's office in Sacramento or the Department's office in Santa Barbara. At the direction of the Commission, the Department extended the deadline for written public comments until September 1, 2002 and the Department and Commission accepted all written comments received before the close of business on that day. The Commission, in turn, solicited written and oral comments regarding the proposed project and Draft ED at a public hearing on August 1, 2002, in San Luis Obispo.

The responses to comments set forth below are intended to fulfill the Department's obligation to provide written responses to the Commission for all comments received during the public review and comment period regarding the proposed project and Draft ED. Consistent with the Commission's certified regulatory program, the Department's responses address all comments regarding the proposed project that provide recommendations to the Commission that are different from that of the Department. [Cal. Code Regs., tit. 14, Section 781.5, subd. (c)]. The responses below also address comments that raise significant environmental points regarding the Draft ED, and approval and implementation of the proposed project. [*Id.*, subd. (h)]. The Department prepared the written responses that follow below guided by principles governing responses to comments under CEQA generally [See Pub. Resources Code, Section 21091, subd. (d); Cal. Code Regs., tit. 14, Section 15088].

8.1 List of Comments Received

A total of 2,492 letters, emails and oral comments were received by the Commission and Department relative to the draft Marine Protected Areas in NOAA's Channel Islands National Marine Sanctuary Draft ED. Of this total, 2,445 were form letters that made identical comments. The Department prepared one response to the form letter (Response to Comment 6), and the form letter itself (E-03) can be found at page 8-79. Thirty nine letters and emails, 1 form email, and seven oral comments specifically commented on the Draft Environmental Document. The 39 letters and emails, 1 form email, and seven oral comments represented 221 Individual comments. One letter requested a change to the proposed regulations in the form of removing the proposal to reopen a portion of the Cowcod Conservation Area. Given recent Federal regulatory changes on the continental shelf, the Department agrees and has removed that portion of the proposal. The remaining letters either supported or opposed the proposed project or supported or opposed one or more of the proposed alternatives. A summary of all of the communications submitted is provided in Table 8-1. A copy of all the correspondence received can be found in Section 8.3.

Table 8-1. Comments received regarding the Draft Environmental Document and proposed regulation for Marine Protected Areas in NOAA's Channel Islands National Marine Sanctuary.

Comment	Name	Date	Reference Number ¹	Summary of Comment
1	Joe Blaylock	6/2/2002	E-01-01	The Department has made non-public deals with the Nature Conservancy to police MPAs.
2	Joe Blaylock	6/2/2002	E-01-02	The Governor postponed the decisions until after October, 2002.
3	Joe Blaylock	6/2/2002	E-01-03	General opposition to MPAs
4	Dave Paden, Josh Paden	6/5/2002	E-02-01	Other methods of fisheries management, including size limits, bag limits, seasons, and gear restrictions, are more appropriate. MPAs are not necessary.
5	Dave Paden, Josh Paden	6/5/2002	E-02-02	Don't increase fishing pressure on remaining open areas by complete closures. The comment contends that the result of increased pressure would lead to more closures.
6	Multiple Names, See Table 8-2	Multiple	E-03-01	General support for proposed project
7	Sean R. Hughes	6/12/2002	L-01-01	General opposition to MPAs
8	Sean R. Hughes	6/12/2002	L-01-02	Commercial fishing is responsible for the majority of fish taken and increase in take is due to improvement of commercial technology.
9	Sean R. Hughes	6/12/2002	L-01-03	The proposed project fails to address the "real problem," which the commenter apparently alleges is caused by over-fishing by commercials.
10	Jeff McMillan	6/17/2002	E-04-01	General support for Alternative 5, this alternative best achieves the national mandate to conserve biodiversity and establish sustainable fisheries.
11	Brian Adair	6/20/2002	E-05-01	General opposition to MPAs
12	Brian Adair	6/20/2002	E-05-02	The Department should consider the value of the sport dollar versus the commercial.
13	Jean-Michel Cousteau	6/20/2002	E-06-01	General support for Alternative 5
14	Gregory Falberg	6/20/2002	L-02-01	General support for the proposed project
15	James B. Ruch	6/21/2002	E-07-01	The proposal fails to consider a phased program with success demonstrated prior to completion.
16	James B. Ruch	6/21/2002	E-07-02	Scientifically predictable results of the proposed project are uncertain.
17	James B. Ruch	6/21/2002	E-07-03	Adequate funding is not available to manage, monitor, and report on MPAs in the proposed project
18	James B. Ruch	6/21/2002	E-07-04	The economic loss to recreational anglers would be too great for the local industry. This would have the greatest impact on anglers who rely on the sport fishing fleet for recreation.
19	James B. Ruch	6/21/2002	E-07-05	There is no environmental disaster occurring in the CINMS that the creation of MPAs would cure. Many tools, sizes, seasons, and limits will work very well to maintain and improve fisheries while providing for the continuation of both recreation and an economically sound sport fishing industry.
20	James B. Ruch	6/21/2002	E-07-06	The document fails to consider a reasonable alternative of a limited, adaptive marine reserve process which would responsibly avoid unacceptable impact to the recreational sport fishing industry.

Comment	Name	Date	Reference Number ¹	Summary of Comment
21	Keith McCoy	6/23/2002	E-08-01	Other management methods including "changing the size limit or limits... and support[ing] more fish hatcheries/habitat" should occur prior to any proposed closures.
22	Kimberly Selkoe	6/24/2002	E-09-01	General support for the proposed project
23	Randle M. Biddle	6/24/2002	E-10-01	General support for the proposed project
24	Cheryl Kohr	6/26/2002	E-11-01	General support for the proposed project
25	Dorothy Steinicke	6/27/2002	L-03-01	General support for the proposed project
26	Joanne R. Johnson	7/3/2002	E-12-01	General support for the proposed project
27	Kurt Lieber	7/3/2002	E-13-01	Support for a total ban on all fishing in 50% of California waters.
28	Kurt Lieber	7/3/2002	E-13-02	No driftnets, gillnets, seine nets or trawlers should be exempt from this total closure.
29	John J. Reynolds	7/3/2002	L-04-01	The commenter expresses support for the proposed project, but contends that the recommended network of reserves is "too small to adequately sustain marine resources" and that "only Alternative 5 is sufficient to achieve conservation of biological diversity and fisheries at the Channel Islands."
30	Pete Lafollette	7/5/2002	E-14-01	General support for Alternative 5
31	Brian Trautwein, Linda Krop	7/5/2002	L-05-01	General support for the proposed project
32	Brian Trautwein, Linda Krop	7/5/2002	L-05-02	The document could be improved by citing lack of peer-reviewed science predicting negative impacts of MPAs, as well as existing evidence suggesting that reserve establishment does not cause "congestion" impacts.
33	Brian Trautwein, Linda Krop	7/5/2002	L-05-03	The final document should list Alternative 5 as the preferred alternative.
34	Brian Trautwein, Linda Krop	7/5/2002	L-05-04	Alternative 5 provides the most significant benefit.
35	Brian Trautwein, Linda Krop	7/5/2002	L-05-05	The proposed project does not meet the conservation goals due to a lack of full habitat representation in all bioregions.
36	Brian Trautwein, Linda Krop	7/5/2002	L-05-06	The proposed project does not incorporate an insurance factor, nor do any alternatives except Alternative 5.
37	Brian Trautwein, Linda Krop	7/5/2002	L-05-07	The proposed project, Alternative 4, 5 and to a limited extent 3 have potential for connectivity.
38	Brian Trautwein, Linda Krop	7/5/2002	L-05-08	The proposed project, Alternative 4, and 5 allow potential monitoring using existing Kelp Forest Monitoring sites.
39	Brian Trautwein, Linda Krop	7/5/2002	L-05-09	Alternative 5 best meets the goal of long-term sustainable fisheries while minimizing short-term economic impacts. The Science Advisory Panel already considered minimizing economic impacts in their recommendation and thus, in order to meet both goals an alternative must fall within their recommended range of 30-50%.
40	Brian Trautwein, Linda Krop	7/5/2002	L-05-10	More treatment should be given to the potential negative impacts of the no-project alternative and Alternatives 1,2 and 3.
41	T.K. Wang	7/6/2002	E-15-01	General support for the proposed project
42	Beatrice Simpson	7/8/2002	L-07-01	General support for the proposed project

Comment	Name	Date	Reference Number ¹	Summary of Comment
43	Michon L. Washington	7/9/2002	L-06-01	The FAA has no comments at this time
44	Rich Holland	6/18/2002	E-16-01	The document assumes project-related socioeconomic impacts are negligible.
45	Rich Holland	6/18/2002	E-16-02	The document assumes MPAs will protect areas from oil spills.
46	Rich Holland	6/18/2002	E-16-03	The document is flawed because it puts marine reserves and commercial fishing ahead of the interests of recreational anglers.
47	Rich Holland	6/18/2002	E-16-04	The document does not address the problems of displaced effort or congestion of effort outside reserves.
48	Rich Holland	6/18/2002	E-16-05	The Marine Reserves Working Group Science Advisory Panel created their own mandate.
49	Deborah Koken	7/11/2002	E-17-01	General support for the proposed project
50	D.O. Mclsaac	7/15/2002	L-08-01	Chapter 4 provides the appropriate baseline
51	D.O. Mclsaac	7/15/2002	L-08-02	The document does not address the potential impact of status quo
52	D.O. Mclsaac	7/15/2002	L-08-03	The rationale for rejecting the alternative to defer to the MLPA is not clear.
53	D.O. Mclsaac	7/15/2002	L-08-04	The document does not address the problems of displaced effort in particular the potential habitat effects.
54	D.O. Mclsaac	7/15/2002	L-08-05	Information on the specific level of effort and displacement is necessary to determine the relative impacts.
55	D.O. Mclsaac	7/15/2002	L-08-06	The document's threshold of significance for habitat representation is not adequately explained.
56	D.O. Mclsaac	7/15/2002	L-08-07	Beyond the Issue of size, the SSC notes that habitat representation is a fundamentally sound approach to determining which areas to place in reserves to protect biodiversity.
57	D.O. Mclsaac	7/15/2002	L-08-08	The arguments for expected fisheries benefits (pp. 6-66, 6-67 and Figure 6-1) are technically weak and not compelling.
58	D.O. Mclsaac	7/15/2002	L-08-09	The SSC agrees 1996-1999 is a reasonable baseline period for commercial fisheries. The SSC agrees with the assessment that activities within the CINMS account for less than 1% of total income and employment in the seven county area of impact.
59	D.O. Mclsaac	7/15/2002	L-08-10	The SSC request documentation be added to the Draft ED (or at least the SEA) regarding how consumer surplus estimates were derived.
60	D.O. Mclsaac	7/15/2002	L-08-11	The SSC considers the estimates of profits for the party/charter sector quite reliable.
61	D.O. Mclsaac	7/15/2002	L-08-12	It is not clear to the SSC why the value of fisheries at Tortugas should be a reasonable proxy for the value of fisheries at CINMS.
62	D.O. Mclsaac	7/15/2002	L-08-13	In order to apply the results used to determine elasticities (0.04, 1.0, and 4.5) for potential increases in recreational quality, it is necessary to make unsubstantiated assumptions.
63	D.O. Mclsaac	7/15/2002	L-08-14	The SSC expresses several reservations regarding the estimation of non-use values and the net benefits assessment found in Chapter 6 of the draft Environmental Document. They also suggest that the benefits and potential costs of monitoring, research, and management should be analyzed.

Comment	Name	Date	Reference Number ¹	Summary of Comment
64	D.O. McIsaac	7/15/2002	L-08-15	The proposed project may have local benefits and, as part of a larger system, may help provide stock-wide benefits
65	D.O. McIsaac	7/15/2002	L-08-16	Substantially more scientific work is needed before proceeding.
66	D.O. McIsaac	7/15/2002	L-08-17	One impact may be displacement of effort into the albacore fishery.
67	D.O. McIsaac	7/15/2002	L-08-18	The document fails to consider the body of opinion that finds only theoretical basis for a 30-50% set aside.
68	D.O. McIsaac	7/15/2002	L-08-19	A minority of the advisors generally supports the proposed project.
69	Jay Elder	8/01/02	O-01-01	Asked the Commission to look at cumulative impacts of State and Federal actions on economics of other regulations as well as Marine Protected Areas.
70	Sal Valone	8/01/02	O-02-01	Sport fishing only takes 3 to 6% of the total compared to commercial. Fisheries like trawl should be eliminated and we wouldn't need closures. Traditional management including size limits and slot limits would be better.
71	Chris Miller	8/01/02	O-03-01	The commenter submitted several scientific papers that he felt supported Alternative 2 and the concept of holistic management.
72	Chris Hoefflinger	8/01/02	O-04-01	The commenter expressed concern for the disproportionate impact to individual fisheries, in particular the rock crab fishery.
73	David Nelson	8/01/02	O-05-01	Cape Canaveral experience shows that closed areas have very positive impact on recreational fishing.
74	Paul Weekland	8/01/02	O-06-01	Even though there is no fishing allowed for Abalone they haven't recovered. This is proof that MPAs do not work.
75	Mike McGinnis	8/2/2002	E-18-01	The document fails to adequately represent the level of public support for a large network of no-take reserves.
76	Mike McGinnis	8/2/2002	E-18-02	More specific characterization of the importance of the nearshore marine environment of the study area should be developed in light of recent fishing closures, and the threat these closures pose to the marine life of the study area.
77	Mike McGinnis	8/2/2002	E-18-03	General support for Alternative 5
78	Mike McGinnis	8/2/2002	E-18-04	The proposed project cannot protect kelp ecosystems in the California and Oregonian biogeographic provinces.
79	Mike McGinnis	8/2/2002	E-18-05	High quality habitats are not included in the proposed project. Some of these habitats may be cut by the Department to support the short-term interests of commercial and sports fishing industries.
80	Mike McGinnis	8/2/2002	E-18-06	It makes sense to first implement MPAs at the Channel Islands and then continue with the rest of the Southern California Bight. That is, in fact, phasing in of MPAs.
81	Mike McGinnis	8/2/2002	E-18-07	Additional kelp forest habitat should be included.
82	Michon L. Washington	8/2/2002	L-09-01	Licensed launches from the California Spaceport are not mentioned in the Draft ED and may affect the commercial launch industry.
83	Mike Villano	8/8/2002	E-19-01	Appears to advocate a "No Action" alternative in favor of recreational fishermen.

Comment	Name	Date	Reference Number ¹	Summary of Comment
84	Diane Pleschner-Steele	8/8/2002	L-10-01	The document provides inadequate information on the impacts of status quo
85	Diane Pleschner-Steele	8/8/2002	L-10-02	The goals and objectives for individual sites are not provided, nor a discussion of why the overlap map was enlarged.
86	Diane Pleschner-Steele	8/8/2002	L-10-03	In order to fully evaluate the costs and benefits of proposed networks the entire State process should proceed at the same time.
87	Diane Pleschner-Steele	8/8/2002	L-10-04	The document does not adequately discuss the potential impacts of effort displacement
88	Diane Pleschner-Steele	8/8/2002	L-10-05	The documents threshold of significance for habitat representation is not adequately explained.
89	Diane Pleschner-Steele	8/8/2002	L-10-06	The document fails to address the concerns of scientists who disagree that MPAs are the only cure for perceived ills, particularly those related to fishery management.
90	Diane Pleschner-Steele	8/8/2002	L-10-07	Constituent involvement in MPA planning is essential.
91	Diane Pleschner-Steele	8/8/2002	L-10-08	Asserts that MPAs are a valuable tool are disputed by most fisheries scientists.
92	Diane Pleschner-Steele	8/8/2002	L-10-09	Marine reserves will do little toward achieving optimum yield for epipelagic and migratory species.
93	Diane Pleschner-Steele	8/8/2002	L-10-10	A single percentage set aside will not work in all cases.
94	Diane Pleschner-Steele	8/8/2002	L-10-11	Dense populations within reserves do not necessarily lead to increased catches in surrounding waters.
95	Diane Pleschner-Steele	8/8/2002	L-10-12	Existing reserves and those proposed have been established without baseline studies.
96	Diane Pleschner-Steele	8/8/2002	L-10-13	Management may need to include a variety of options including selective fishing.
97	Diane Pleschner-Steele	8/8/2002	L-10-14	The Primary emphasis should be on protection of valuable and vulnerable areas, rather than on achievement of a percentage goal for any given region.
98	Diane Pleschner-Steele	8/8/2002	L-10-15	The potential economic and ecological benefits of marine reserves will not be realized without a sufficient commitment to enforcement and monitoring.
99	Diane Pleschner-Steele	8/8/2002	L-10-16	The SSC considers the choice of reserve size to be a policy decision.
100	Diane Pleschner-Steele	8/8/2002	L-10-17	Substantial fisheries benefits on a stock-wide scale are unlikely to result under any MPA alternative.
101	Diane Pleschner-Steele	8/8/2002	L-10-18	It is not possible to draw any conclusions regarding the relative costs and benefits of marine reserves.
102	Diane Pleschner-Steele	8/8/2002	L-10-19	The new defacto reserve established through groundfish closures must be considered.
103	Diane Pleschner-Steele	8/8/2002	L-10-20	Reserves do not address the prospect of sea otter emigration into southern California.
104	Chris Hoeflinger	8/18/2002	L-11-01	The Department has segmented the project in violation of CEQA sec. 15165. The implementation of the MLPA is foreseeable and should have been the full project reviewed in the draft Document.
105	Chris Hoeflinger	8/18/2002	L-11-02	Due to lack of public participation and oversight in designing the DFG/CINMS preferred alternative, it is difficult to understand what specific goals have been achieved.

Comment	Name	Date	Reference Number ¹	Summary of Comment
106	Chris Hoeflinger	8/18/2002	L-11-03	The congestion resulting from displaced effort into areas immediately outside and adjacent to MPAs will result in an adverse environmental impact.
107	Chris Hoeflinger	8/18/2002	L-11-04	The draft Environmental Document does not include the MLPA, cowcod, or shelf closures in its future or past projects list.
108	Chris Hoeflinger	8/18/2002	L-11-05	The document does not mention the current array of Fisheries management measures and makes no mention of abundant stocks.
109	Chris Hoeflinger	8/18/2002	L-11-06	The document fails to adequately consider the No-Action alternative.
110	Chris Hoeflinger	8/18/2002	L-11-07	The Draft ED does not propose adequate monitoring. It does not propose adequate pre-project monitoring and must include a detailed monitoring Plan.
111	Chris Hoeflinger	8/18/2002	L-11-08	The draft Environmental Document does not adequately propose mitigation for individual fisheries impacted by the proposed project particularly the red crab fishery.
112	Chris Hoeflinger	8/18/2002	L-11-09	The proposed project Draft ED makes numerous assumptions on reserve theory, which are not supported by substantial evidence in the record. The Science Advisory Panel concluded that large closures would be effective in the CINMS because large closures were effective elsewhere.
113	Chris Hoeflinger	8/18/2002	L-11-10	The Department is using a percentage based approach to determine reserve size.
114	Chris Hoeflinger	8/18/2002	L-11-11	The Science Advisory Panel used habitat as a proxy for species distribution, this resulted in hidden environmental and economic impacts due to the actual distribution and concentration of species being much more compressed than assumed.
115	Chris Hoeflinger	8/18/2002	L-11-12	The Science Advisory Panel concluded that three separate biogeographic regions are contained within the project area. None of the 119 species emanates from or exhibits characteristics unique to the transition region. By substituting biogeographic region for species range, the number of MPAs is unnecessarily increased.
116	Chris Hoeflinger	8/18/2002	L-11-13	The Science Advisory Panel incorrectly concluded that 119 species were in need of and would receive additional protection from MPAs. 57 of these species are fully protected and of the remaining 62 only 33 are not shelf or nearshore rockfish.
117	Chris Hoeflinger	8/18/2002	L-11-14	The Science Advisory Panel assumed that fishery management at the CINMS is poor or nonexistent.
118	Chris Hoeflinger	8/18/2002	L-11-15	The generally accepted range of percentage for reserve size is as follows: a) monitoring reserves 1-10%, b) Added precaution in fishery management 10-20%, c) Alternative fishery management and stock rebuilding 20-50%. In light of groundfish closures, stock rebuilding appears unnecessary and redundant.
119	Chris Hoeflinger	8/18/2002	L-11-16	The draft Environmental Document fails to consider an alternative that meets the requirements of the MLPA with representative habitat as the objective.
120	Chris Hoeflinger	8/18/2002	L-11-17	General support for Alternative 6
121	James P. Burgess, III	8/29/2002	L-12-01	General support for the proposed project
122	James P. Burgess, III	8/29/2002	L-12-02	The final document should acknowledge new management measures for rockfish that have occurred or may occur.

Comment	Name	Date	Reference Number ¹	Summary of Comment
123	James P. Burgess, III	8/29/2002	L-12-03	The proposal to reopen a portion of the Cowcod Conservation Area may no longer be consistent with rockfish management.
124	James P. Burgess, III	8/29/2002	L-12-04	Another resource management concern is the lack of protection of seabirds in critical breeding and roosting areas.
125	James P. Burgess, III	8/29/2002	L-12-05	The final document should discuss existing and/or planned biological and economic monitoring and plans for enforcement.
126	Chris Miller	8/30/2002	L-13-01	The final document should include more detailed discussion of how MPAs will be integrated into fisheries management.
127	Chris Miller	8/30/2002	L-13-02	The project is inappropriately segmented in the analysis. It does not give adequate attention to the cumulative impacts of the MLPA.
128	Chris Miller	8/30/2002	L-13-03	The proposed project should be implemented as a pilot or test case.
129	Chris Miller	8/30/2002	L-13-04	The document does not reference any scientific papers that deal with the problems of congestion of fishing effort or zonal management. There are no resources cited in support of social geography, cartography, anthropology, community-based management, societal and ethical values, etc.
130	Chris Miller	8/30/2002	L-13-05	The document fails to analyze CalCOFI larval survey data to explain source and sink populations.
131	Chris Miller	8/30/2002	L-13-06	The document inadequately discusses the ecological science framework and tradeoffs of designing marine reserves to protect species at the edge of their ranges.
132	Chris Miller	8/30/2002	L-13-07	The document does not provide detail on long term monitoring plans.
133	Chris Miller	8/30/2002	L-13-08	The document ignores the NRC Report's findings that quality habitat should be set aside as opposed to a pre-determined percentage goal.
134	Chris Miller	8/30/2002	L-13-09	The Proactive Fishermen's Plan (Alternative 2) selects the best quality areas for no-take MPAs.
135	Chris Miller	8/30/2002	L-13-10	The document should analyze whether existing fisheries management is adequate to protect the species of interest.
136	Chris Miller	8/30/2002	L-13-11	The species of concern list was not a consensus product of the MRWG and was developed by the Sanctuary and Department.
137	Chris Miller	8/30/2002	L-13-12	What negative impacts on fishery stocks and habitat are a consequence of squeezing the same number of fishermen into (for the preferred alternative) 75% of the fishing space?
138	Chris Miller	8/30/2002	L-13-13	The document does not consider the impacts of individual areas on displacement of the lobster fishery particularly on the North side of Anacapa Island and the Northeast side of Santa Cruz Island.
139	Chris Miller	8/30/2002	L-13-14	The proposed project disproportionately impacts the red crab fishery.
140	Chris Miller	8/30/2002	L-13-15	The proposed project closes a significant portion of the kelp beds, thus disproportionately impacting sea urchin fishermen.

Comment	Name	Date	Reference Number ¹	Summary of Comment
141	Chris Miller	8/30/2002	L-13-16	The proposed project would restrict white seabass and halibut fishing by an additional 25% without mitigation.
142	Chris Miller	8/30/2002	L-13-17	The document does not discuss the prospect of increased foreign competition for market share and potential cumulative impacts to marine resources as a result of "accelerating competition and transferal of effort to another region of the same ecosystem, the California Bight in Mexican waters."
143	Chris Miller	8/30/2002	L-13-18	The Draft ED fails to provide "management context" under CEQA for Project Alternatives, which "masks" significant environmental impacts.
144	Chris Miller	8/30/2002	L-13-19	The final document should discuss what biological performance standards will be used to measure performance.
145	Chris Miller	8/30/2002	L-13-20	The proposed project does not consider the relative scale of reserve size compared to island size and use patterns.
146	Chris Miller	8/30/2002	L-13-21	The document fails to consider the relative heterogeneity of ecological features within reserves.
147	Chris Miller	8/30/2002	L-13-22	A variety of options for phasing are provided by the commenter and should be presented in the final document.
148	Doug Obegi	8/31/2002	L-14-01	General support for the proposed project
149	Doug Obegi	8/31/2002	L-14-02	The document is legally sufficient under CEQA
150	Doug Obegi	8/31/2002	L-14-03	The document does not sufficiently describe the potential impacts of alternative 6 (defer to MLPA) and 7 (no action).
151	Doug Obegi	8/31/2002	L-14-04	A more thorough treatment of the environmental effects of the project is desirable.
152	Doug Obegi	8/31/2002	L-14-05	The executive summary should more extensively analyze each alternative with respect to the ecological criteria in Section 5.3.1. Table E-1 should be revised to show the potential negative impacts of no action or deferring to the MLPA.
153	Doug Obegi	8/31/2002	L-14-06	More detail should be provided on how deferring to the MLPA will not meet the goals or objectives of the proposed project.
154	Doug Obegi	8/31/2002	L-14-07	Taking no action and deferring to the MLPA are substantively the same and should be combined as a single alternative.
155	Doug Obegi	8/31/2002	L-14-08	The Department is correct in its assertion of no significant environmental impacts
156	Doug Obegi	8/31/2002	L-14-9	Section 5.3 should be reorganized to make it clearer that parts are the ecological criteria used to draft the proposed project and parts are an analysis of how the proposed project meets those criteria.
157	Doug Obegi	8/31/2002	L-14-10	The criteria for habitat representation comparisons on 5-12 should be more completely explained.
158	Doug Obegi	8/31/2002	L-14-11	A table or set of tables comparing the habitat representation of each alternative within each biogeographical region and each habitat type would be helpful.

Comment	Name	Date	Reference Number ¹	Summary of Comment
159	Doug Obegi	8/31/2002	L-14-12	The final document should include analysis of how each alternative meets the criteria of including existing monitoring sites as well as information on the level of existing monitoring.
160	Doug Obegi	8/31/2002	L-14-13	The final document should include information on why each alternative does or does not include a multiplier to insure against catastrophes.
161	Doug Obegi	8/31/2002	L-14-14	The final document should include a summary table describing the analysis with respect to ecological criteria.
162	Doug Obegi	8/31/2002	L-14-15	The final document should include a discussion of why impacts of congestion of effort would not be significant under CEQA.
163	Doug Obegi	8/31/2002	L-14-16	Where possible the final document should evaluate environmental benefits of the proposed project and alternatives.
164	Doug Obegi	8/31/2002	L-14-17	Other fisheries management activities, including the recent groundfish closures, should be included in the discussion of cumulative impacts.
165	Doug Obegi	8/31/2002	L-14-18	The document should be edited by moving information on FMPs to a section discussing the impacts of other fisheries management activities.
166	Doug Obegi	8/31/2002	L-14-19	If the document's discussion of economic impacts is edited it should still contain qualitative analyses of long term costs and benefits of the proposed project
167	Rod Fujita, Richard Charter	9/3/2002	L-15-01	The Fish and Game Commission has clear authority to establish MPAs
168	Rod Fujita, Richard Charter	9/3/2002	L-15-02	The final document should fully comply with the federal Endangered Species Act, including provisions of Section 7 consultations.
169	Rod Fujita, Richard Charter	9/3/2002	L-15-03	The proposed project best accomplishes the established goals while minimizing consumptive user impacts.
170	Rod Fujita, Richard Charter	9/3/2002	L-15-04	The proposed project was specifically sized and located to avoid high use areas while maintaining habitat representation.
171	Rod Fujita, Richard Charter	9/3/2002	L-15-05	Due to the recent shelf closures the short term economic costs are dramatically overstated and the long term benefits understated in the document.
172	Rod Fujita, Richard Charter	9/3/2002	L-15-06	The no project alternative would not meet the project goals and would have negative impacts.
173	Rod Fujita, Richard Charter	9/3/2002	L-15-07	The defer decision alternative is unacceptable as it would allow continued declines in resources.
174	Marina Cazorla	9/3/2002	L-16-01	No coastal development permit will be required for the proposed project.
175	Marina Cazorla	9/3/2002	L-16-02	General support for Alternative 5. Only Alternative 5 meets the Science Advisory Panels recommendations for reserve size. Alternative 5 would protect the largest area and the greatest number of different habitats. Alternative 5 is the only alternative that includes an insurance factor as recommended by the Science Advisory Panel.
176	Marina Cazorla	9/3/2002	L-16-03	The Department should include discussion of new groundfish regulations including a re-assessment of potential socio-economic impacts which would likely decrease.
177	Marina Cazorla	9/3/2002	L-16-04	The document should clarify the Coastal Commission jurisdiction.

Comment	Name	Date	Reference Number ¹	Summary of Comment
178	Marina Cazorla	9/3/2002	L-16-05	The document should expand the discussion of the Southern sea otter and include the most recent population data.
179	Marina Cazorla	9/3/2002	L-16-06	The environmental impacts of existing commercial fishing should be discussed along with the potential benefits of marine reserves.
180	Marina Cazorla	9/3/2002	L-16-7	The economic overview of commercial fishing should be revised based on the new groundfish regulations.
181	Marina Cazorla	9/3/2002	L-16-8	The document's discussion of Oil and Gas should be expanded and include recent proposals to expand extended reach drilling and discussions of potential impacts of spills.
182	Marina Cazorla	9/3/2002	L-16-9	The information on passive use benefits should be expanded.
183	Harry Liquornik	9/3/2002	L-17-01	It is questionable if there was adequate community involvement to include Santa Barbara Island in the range of alternatives, it is primarily fishery from the Los Angeles and Ventura regions and there were no community meetings held in the Los Angeles region.
184	Harry Liquornik	9/3/2002	L-17-02	The range of alternatives is inadequate because the lower end of the scope has large reserves in the western portion of the project area and little to no reserve area in the Eastern portion.
185	Harry Liquornik	9/3/2002	L-17-03	Why does the Department use Alternative 1, the areas of overlap as the lower end of the range?
186	Harry Liquornik	9/3/2002	L-17-04	No action was taken by the Department or Commission to address a request to change Alternatives 1 or 3 due to disproportionate impacts to Santa Barbara harbor and their failure to protect habitat in all three bioregions.
187	Harry Liquornik	9/3/2002	L-17-05	The document should address potential negative impacts of displaced consumptive activities. How does the Department propose to follow the Science Advisory Panel recommendation that effort should not increase in the remaining open areas?
188	Harry Liquornik	9/3/2002	L-17-06	The document does not discuss fish behavior and mobility in relation to residence time within a marine reserve and how this will affect the benefits of marine reserves on different species.
189	Harry Liquornik	9/3/2002	L-17-07	The document should list or rank local species that may or may not receive benefits from marine reserves. Local fish behavior and movement patterns should be cited and a ranking of benefits from spillover developed.
190	Harry Liquornik	9/3/2002	L-17-08	How did the Department determine levels of significance for economic impacts in developing the proposed project?
191	Harry Liquornik	9/3/2002	L-17-09	The Draft ED should note the potential area closures under the Endangered Species Act for threatened bird populations. All areas that may be considered for closure should be identified to address potential cumulative impacts.
192	Harry Liquornik	9/3/2002	L-17-10	No community or MRWG meetings were held in the Los Angeles region to allow adequate community input for this region.
193	Harry Liquornik	9/3/2002	L-17-11	The Scorpion Anchorage site, coupled with Painted Cave, will lead to excessive displacement of squid and lobster fishing.

Comment	Name	Date	Reference Number ¹	Summary of Comment
194	Harry Liquornik	9/3/2002	L-17-12	What is the Department's rationale and biological benefits for creating a recreational take only site at Painted Cave when specific congestion concerns were raised from the commercial sector.
195	Harry Liquornik	9/3/2002	L-17-13	Concerns were raised regarding displacement and impacts to prawn trap fishing and pelagic fishing at Gull Island as well as enforcement issues with the northwest boundary.
196	Harry Liquornik	9/3/2002	L-17-14	Concerns were raised regarding gill net fisheries outside one nautical mile in the Carrington Point site. The halibut and white sea bass fisheries analysis should be gear, rather than species specific.
197	Harry Liquornik	9/3/2002	L-17-15	The Skunk Point site coupled with Carrington Point will lead to excessive displacement and congestion of the crab and halibut fisheries.
198	Harry Liquornik	9/3/2002	L-17-16	How does the Department propose to deal with displaced effort from the crab fishery?
199	Harry Liquornik	9/3/2002	L-17-17	What is the Department's rationale for including more than 90% of the North facing habitat of San Miguel Island?
200	Harry Liquornik	9/3/2002	L-17-18	The proposed project moves the western boundary of the South Point SMR one mile west from where it was originally drawn in the public process. What is the Department's rationale for moving the western boundary at South Point, Santa Rosa Island?
201	Harry Liquornik	9/3/2002	L-17-19	What is the rationale for including two alternatives (1 and 3) that have the majority of reserve habitat representation in the Oregonian and Transition province and have a disproportionate impact to Santa Barbara Harbor?
202	Harry Liquornik	9/3/2002	L-17-20	Why does the document include alternatives that have boundaries that are confusing and difficult to enforce?
203	Harry Liquornik	9/3/2002	L-17-21	How did the Department determine it's preference to establish a network with lower economic impacts than alternatives 4 and 5.
204	Harry Liquornik	9/3/2002	L-17-22	The document fails to recognize the phasing sub options of Alternative 2 as well as the recommendation to include Santa Barbara Island in the MLPA process.
205	Harry Liquornik	9/3/2002	L-17-23	The document and proposed project do not include any additional monitoring plans that will contribute to future decisions. How do the lead agencies propose to gather economic and biological data for use in future decisions such as the MLPA?
206	Harry Liquornik	9/3/2002	L-17-24	How does the Department propose to address fleet reduction for fisheries that are fully exploited, overcapitalized, displacement and congestion from the establishment of MPAs?
207	Harry Liquornik	9/3/2002	L-17-25	Short term harvest reductions on top of area closures with out proper overall fleet reduction combined with the proposed project will lead to excessive congestion, over fishing and unsustainable fisheries. The document does not adequately discuss the potential impacts of congestion of effort. Cite any local or regional studies of marine reserves for spillover benefits for offsetting congestion.
208	Harry Liquornik	9/3/2002	L-17-26	The document should explain what additional information would be required to allow proper socioeconomic analysis under the Regulatory Flexibility Act. How do the lead agencies propose to determine if there would or would not be significant impacts under the Regulatory Flexibility Act, RIR, and NEPA for the Federal phase of the proposed project?

Comment	Name	Date	Reference Number ¹	Summary of Comment
209	Harry Liquornik	9/3/2002	L-17-27	The statement that "little is know about the distribution of hard sediments on the deep continental shelf and slope in the Sanctuary" is not made in the Habitat Representation section for the proposed project.
210	Harry Liquornik	9/3/2002	L-17-28	It should be noted that fisheries dependent on kelp availability may experience additional congestion from additional loss of fishing grounds due to limited kelp abundance during El Niño or other events.
211	Jim Curland	9/3/2002	L-18-01	The proposed project is the minimum protection necessary.
212	Jim Curland	9/3/2002	L-18-02	General support for Alternative 5
213	Jim Curland	9/3/2002	L-18-03	We do not believe the Project fulfills the biodiversity goal and other key MHPA mandates to appropriately balance long-term interests with short-term impacts.
214	Jim Curland	9/3/2002	L-18-04	The Project does not adequately address the MRWGs Ecosystem Biodiversity Goal.
215	Jim Curland	9/3/2002	L-18-05	The proposed project does not incorporate an insurance factor in order to protect against catastrophic events.
216	Jim Curland	9/3/2002	L-18-06	There is inadequate representation of kelp forest habitats in both the proposed project (21%) and Alternative 5 (24%), this habitat should be represented at closer to 30-50%.
217	Jim Curland	9/3/2002	L-18-07	It is unclear what is meant by the last two comments in section 2.7, Areas of Concern, regarding environmental allocation and conflicts among user groups.
218	Jim Curland	9/3/2002	L-18-08	The Fish and wildlife service is the agency that is responsible for the implementation of ESA as it pertains to sea otters.
219	Jim Curland	9/3/2002	L-18-09	The southern sea otter is listed as "threatened" not "endangered" under the Federal ESA.
220	Mark Rauscher	9/3/2002	L-19-01	Feeding of marine wildlife for the purposes of viewing, and other forms of wildlife harassment, needs to be better addressed in developing management plans for Marine Protected Areas within the Channel Islands National Marine Sanctuary.
221	Mark Becker	9/11/2002	O-07-01	The proposal should require the use of specific electronic equipment when fishing in the region. This would make enforcement of and navigation around boundaries simpler and boundary violations easier to prosecute.

¹E = Electronic, L=Written Letters, O=Oral

8.2 Department Response to Comments

Abbreviations Used in Responses

CEQA - California Environmental Quality Act
CINMS - Channel Islands National Marine Sanctuary
Draft ED - Draft Environment Document
ED - Environment Document
ESA - Endangered Species Act
Final ED - Final Environmental Document
FMP - Fishery Management Plan
MLMA - Marine Life Management Act
MLPA - Marine Life Protection Act
MOUs - Memoranda of Understanding
MPAs - Marine Protected Areas
MRWG - Marine Reserves Working Group
NEPA - National Environmental Policy Act
NOAA - National Oceanic and Atmospheric Administration
NPS - National Park Service
NRC - National Research Council
PFMC - Pacific Fishery Management Council
RFA - Regulatory Flexibility Act
RIR - Regulatory Impact Review
SAC - Sanctuary Advisory Council to the Channel Islands National Marine Sanctuary
SAP - Science Advisory Panel to the Marine Reserves Working Group
SSC - Science and Statistics Committee of the Pacific Fishery Management Council

Comment 1: The Department has made non-public deals with the Nature Conservancy to police MPAs.

Response 1: The Department disagrees. Enforcement for MPAs will be provided by Department enforcement staff along with other public agencies that have established Memoranda of Understanding. Certain of these agencies also provide funding through the MOUs. These agencies include the Channel Islands National Marine Sanctuary, Channel Islands National Park, NOAA Fisheries, and United States Coast Guard. The joint enforcement plans and MOUs were discussed during public MRWG and SAC meetings and by the SAC's enforcement subcommittee.

Comment 2: The Governor postponed the decisions until after October, 2002.

Response 2: The Department disagrees. The Fish and Game Commission initially moved the adoption date to December 2002 in order to facilitate comment from the Pacific Fishery Management Council. The Commission subsequently moved the adoption date back to October, 2002.

Comment 3: Expressed general opposition to MPAs.

Response 3: Comment noted.

Comment 4: Favors other methods of fisheries management, including closure of certain areas to commercial fishing, size limits, bag limits, seasonal restrictions, and gear restrictions. Asserts that MPAs are not necessary.

Response 4: The Department disagrees. In enacting the MLMA in 1998, the Legislature identified objectives that facilitate the primary fishery management goal of sustainability to include the maintenance, restoration and enhancement of marine fishery habitat, but also expressly identified other conservation and management measures. In enacting the MLPA in 1999, the Legislature expressly recognized that MPAs and sound fishery management are complementary components of a comprehensive effort to sustain marine habitats and fisheries. MPAs are considered one of many tools available to fisheries managers and are not the only tool used in the project area. However, certain ecosystem functions of MPAs can not be provided by other management measures. For example, size, season, and bag limits, do not prevent bycatch of non-target species or undersized individuals nor do they fully provide for natural predator and prey interactions. It is clear that traditional management measures alone have not been sufficient to protect groundfish and other populations. Incidental impacts of various fishing practices may also have unintended effects that would not occur in an MPA, particularly a no-take reserve. This includes both direct impacts to the environment (e.g., damage to a reef from trawling) and indirect ecosystem impacts (e.g., removing all large, old individuals and altering the size composition). MPAs by their nature provide for undisturbed habitats and act as "natural hatcheries". These facts lead to benefits in total production and export of young. The Department believes MPAs are an important and necessary component of the proposed project.

In addition to fisheries-related goals, the proposed project is intended to address ecological goals including representing habitats and species for their intrinsic values. MPAs provide insurance for management uncertainty by providing areas where species can interact in a relatively undisturbed ecosystem. The proposed project contemplates the coordination of MPAs with other management measures to complete the regulatory framework (see Draft ED at page E-3). Fisheries management issues involving specific measures are more appropriately addressed through the FMP process. The Draft ED recognizes that MPAs should be coordinated with fisheries management and discusses how fisheries management activities will compliment MPAs on page 5-18. The proposed project attempts to address a specific set of goals and objectives, including, but not limited to, objectives to help sustain fisheries. The specific integration of MPAs into fisheries management, including reductions in overall fleet capacity, total allowable catch, and allocation between user groups is more appropriately dealt with through the FMP process. FMPs are the tool used to establish these limits. The Nearshore FMP, for example, includes the use of MPAs in the management strategy.

Comment 5: The comment requests that the Department not increase fishing pressure on remaining open areas by complete closures and suggests the result of increased pressure would lead to more closures.

Response 5: The potential impacts of congestion in general are described in the Draft ED at pages 5-17 through 5-18, and within the proposed project on page 5-31. This discussion indicates that, although certain activities will be displaced spatially by MPAs, the level of displacement is relatively low, with any added pressure outweighed by expected benefits to the fishery. These benefits would include more sustainable resources in the long-term as well as potential increases in catch due to added

production from within MPAs. The key question regarding congestion is whether the expected increase in export from reserves can compensate for the increased fishing pressure in non-reserve areas. If it does, fishery yields will show a net increase or remain the same despite the displaced effort. If congestion leads to a negative habitat impact, populations on the borders of reserves would be expected to show an equivalent decline. As described in the Final ED on page 5-18, the comprehensive reviews of reserves by Halpern (2002) and Palumbi (2002) suggest that production increases inside reserves are considerably larger than expected increases in take outside reserves. In the case of the proposed project, 100% of the effort would be limited to approximately 81% of the area (with a 19% closure). The empirical data in these studies suggest that enhanced production within reserves can more than compensate for the effects of congestion outside for reserve areas as high as 50%. These conclusions are supported by empirical data outside reserves. Studies consistently show increases in abundance immediately outside reserves that would not occur if habitat impacts were negative (e.g., Roberts et al. 2001; Stevens and Sulak 2002; Murawski et al. 2000; McClanahan and Kaunda-Arara 1996; Ratikin and Kramer 1996; and Russ and Alcala 1996b).

The MLPA, with which the proposed project must be consistent, expressly requires the Department, in evaluating proposed projects with potential adverse impacts, to highlight those impacts and to recommend measures to avoid or fully mitigate any impacts that are inconsistent with MLPA goals and guidelines, or the objectives of the MPA. Thus, the MLPA itself provides additional safeguards against the proposed project having significant adverse environmental impacts. As a result of this evaluation, the Department concluded that no such significant adverse impacts will result from the proposed project. Further, although the phenomenon of congestion has been determined not to rise to the level of a significant impact, the Department notes that the adaptive management component of the proposed project, as required by the Marine Life Protection Act, which includes ongoing monitoring, research and evaluation after project approval, will provide ongoing information regarding post-approval environmental conditions. This information, along with the Department's authority to recommend additional management measures to the Commission, will ensure that approval of the proposed project does not result in any significant environmental impacts. This would not be limited to creation, modification, or removal of MPAs and could include measures such as reduced allowable catch, increased size limits, seasonal closures, etc.

The proposed project is not deficient because it does not provide economic mitigation for impacted commercial fisheries. The concept of "mitigation" referenced in the Draft ED is in relation to environmental impacts to the resource itself, not to the socioeconomic activities related to the resource. Because no project-related significant effects are expected, mitigation measures are unnecessary under CEQA. Indeed, economic and social effects of a project are not environmental impacts per se for purposes of CEQA. Accordingly, no economic mitigation to impacted fisheries is required. Additional discussion of the role of socioeconomic analysis in the Draft ED may be found in the Response to Comment 12.

Comment 6: Expresses general support for the proposed project.

Response 6: Comment noted.

Comment 7: Expresses general opposition to MPAs.

Response 7: Comment noted.

Comment 8: Commercial fishing is responsible for the majority of fish taken, as compared to recreational anglers, and the increase in commercial take is due to recent improvements in commercial technology.

Response 8: The Department disagrees. While it is true that commercial fishing takes the majority of fish (by number and weight) of all species combined, recreational anglers also have an impact. The breakdown of catch is, in fact, much more even when looking at individual species, especially in the nearshore environment. For instance, recreational anglers take approximately 60% of all nearshore finfish (based on average landings 1994-1998). In addition, recreational anglers tend to target larger "trophy" fish that can provide significantly more reproductive potential to a population. While commercial fishing technology has contributed to increased efficiency, other technology has also increased the recreational angler's ability to target specific areas repeatedly, including advances in navigational equipment such as Global Position System and RADAR.

Comment 9: The proposed project fails to address the "real problem," which the commenter apparently alleges is caused by over-fishing by commercials.

Response 9: The Department disagrees. The goals of the project address resource issues from an ecological and whole ecosystem perspective and are not focused at any particular user group. Current environmental impacts associated with commercial fishing would be reduced by the proposed project through complete closure of certain areas of critical habitats. The proposed project is not limited to regulations on recreational anglers. In fact, in two areas the project proposes allowing recreational take while prohibiting commercial take. See also Response to Comment 8 regarding relative take by various user groups.

Comment 10: The commenter expresses general support for Alternative 5 and states that this alternative best achieves the national mandate to conserve biodiversity and establish sustainable fisheries.

Response 10: The Department disagrees that Alternative 5 best achieves the national mandate to conserve biodiversity and establish sustainable fisheries. While none of the MPA network alternatives (the proposed project and Alternatives 1 through 5) is expected to have negative impacts on the environment, the proposed project proposes the highest number of habitats at a level of 20% or more. The SAP recommendation to include at least 30% of all habitats had to be integrated with other MPA scientific and resource-user considerations to achieve the most feasible alternative. Alternative 5 is the only alternative that exceeds the SAP's minimum recommendation for total area, but it does a poorer job of representing individual habitats. Alternative 5 only represents 11 of the 17 habitats at a level of 20% or more of which 5 are represented at 30% or more. While Alternative 5 is the only alternative that incorporates an "insurance factor", this does not mean Alternative 5 environmentally superior because, among other reasons, the distribution of MPAs in multiple areas around the islands inherently limits the impacts of single events on all reserves at once (See Draft ED at p. 5-31). Various mechanisms to reduce the chance of tanker collisions (e.g. vessel traffic separation)

and to mitigate oil spills (e.g. spill response plans) also already exist and provide additional insurance.

Conversely, while the proposed project is not the largest in overall area, it provides representation to the highest number of habitats at a level of 20% or more of all the alternatives. The proposed project represents 12 of 17 habitats used by the SAP for comparison of alternatives at a level of 20% or more, of which 5 are represented at 30% or more. The project also seeks to minimize short-term socioeconomic impacts while maintaining an ecologically viable network. By effectively including more heterogeneous habitats, the proposed project reduces the overall area subject to the proposed MPAs and therefore achieves the goal of minimizing economic impacts to a greater extent than Alternative 5. Finally, the proposed project is intended to function along with other management strategies to provide for sustainable resources. The proposed project has a higher ratio of habitat representation per dollar impact than Alternative 5 and thus is better at minimizing cost while maximizing habitat representation (a proxy for protecting species) (See Draft ED Table 6-69 at p. 6-69). Thus, using the same bases of habitat representation as a proxy for protection of species used by the SAP, the proposed project is actually more likely to achieve conservation of biological diversity and promotion of sustainable fisheries than other alternatives. While the Department believes that the proposed project best meets all the goals, including both ecological and economic objectives, and best represents habitats, the Commission will ultimately decide whether to adopt the proposed project or some other alternative.

Comment 11: Expresses general opposition to MPAs.

Response 11: Comment noted.

Comment 12: The Department should consider the value of the sport dollar versus the commercial.

Response 12: The Department prepared a detailed economic impact analysis as part of the planning process for the proposed project even though economic and social effects of a project are not environmental impacts per se for purposes of CEQA. The results are included in the potential impacts to the human environment in Section 5.4 and Chapter 6 of the Draft ED. This economic analysis will be incorporated into the Fiscal and Economic Impact Statement, which will be reviewed by the Trade and Commerce Agency and must be approved by the Department of Finance. After that, the Department, on behalf of the Commission, will submit the analysis to the Office of Administrative Law as part of the rulemaking file required to promulgate regulations. Against this backdrop, the Department believes the existing economic analysis provides important information to the Commission and public at large that will foster informed public decisionmaking.

Comment 13: Expresses general support for Alternative 5.

Response 13: See Response to Comment 10.

Comment 14: Expresses general support for the proposed project.

Response 14: Comment noted.

Comment 15: The proposal fails to consider a phased program with success demonstrated prior to expanding the reserve system.

Response 15: Phasing is discussed in the Initial Statement of Reasons for Regulatory Action and in Alternative 2 (the "Proactive Fishermen's Plan") as Attachment 8 to that document. For clarity, a summary of the same information is included in the Final ED in Section 3.2.2. Phasing, however, is not required by the MLPA. The act provides, in fact, that it is not intended to restrict any existing authority of the Department or the Commission to make changes to improve the management or design of existing MPAs, or to designate new MPAs. Phasing, as a result, is neither required nor prohibited by the MLPA.

The Department is not recommending phasing of the proposed project to the Commission for several reasons. First, some de facto phasing occurs as a natural consequence of program implementation: first by the Fish and Game Commission (for actions in state waters), and then later, by the CINMS (for actions in federal waters). Second, phasing can occur if the Fish and Game Commission decides to implement some portions of the plan before others. Third, phasing would not alter the final impacts to the environment of the whole project, although it could delay socioeconomic impacts over time. Fourth, phasing might add another layer of complexity to the implementation of monitoring, research, and evaluation activities, as well as to the generation of baseline information. Also, phased or incremental approach to implementation would not necessarily avoid socioeconomic impacts to recreational and commercial fishing, but would only draw them out. Most importantly, delays in implementing the MPAs would delay the realization of environmental benefits flowing from such MPAs.

Comment 16: Scientifically predictable results of the proposed project are uncertain.

Response 16: The Department rejects the implied assertion that absolute scientific certainty is necessary before the Commission takes action with respect to the proposed project. Neither the MLPA nor any other legal authority mandates such an approach. In fact, the MLPA expressly contemplates and requires use of the "best readily available science" and the Draft ED adheres to such a standard. In the absence of location-specific empirical evidence, scientific theory and theoretical studies form the basis of best readily available science. Because there is little location-specific empirical evidence, the best readily available science regarding the proposed project, alternatives and their respective effects is grounded in sound scientific theory and theoretical analysis. Moreover, one of the reasons underlying the MLPA to establish MPAs in the first place is to obtain environmental "baseline information" and "and to establish environmental reference points." For this reason, the MLPA expressly contemplates the application of "adaptive management" in areas of scientific uncertainty as a framework to adjust management actions in response to monitoring, research and data indicating the need for such changes. The scientific basis for expected results of the proposed project is discussed in detail in the Draft ED Chapter 5.

One of the benefits of MPAs is that they provide a buffer against management uncertainty by maintaining portions of a habitat or population in a natural state that will provide baseline information and reference points against which scientists can measure changes elsewhere in the marine environment. In addition, the Channel Islands National Park Kelp Forest Monitoring program already provides a baseline of information for 16 sites that have been monitored for 20 years. The proposed project includes 7 of these 16 within MPAs, allowing comparison of changes after

implementation. Analysis in the Draft ED is based, in part, on monitoring results over the past 20 years. In addition the Partnership for Interdisciplinary Studies of Coastal Oceans (PISCO) monitors 6 additional subtidal sites. The PISCO sites have been monitored since 1999 and provide additional baseline information relied on in the Draft ED.

There is also no authority requiring resource managers to undertake site-specific research "from scratch" or that forbids reliance on existing, analogous research that has already been subjected to peer review. In fact analogous information is often used in scientific review or application of scientific information when site specific data are not available. Again, the MLPA, only contemplates the use of "the best readily available science." The Department believes that consideration of such studies meets this standard, and that reliance upon them is reasonable. In that respect, the SAP recommendation was based on the review of published scientific articles. Among those articles were studies of large fisheries management closures, as well as small and large MPAs. Their conclusions were based on both empirical evidence and theory found in the bulk of the articles (See Draft ED at pp. 5-7 through 5-12). In addition, most fishery scientists are familiar with the effects of marine reserves on protected habitats and species. According to the Pacific Fishery Management Council Draft Technical Analysis on Marine Reserves (Parrish et al., 2000) "Marine reserves demonstrably conserve and enhance fish populations within their borders by (1) increasing fish abundance, size, and relative age composition, (2) protecting critical spawning stocks and habitats, (3) providing multi-species protection, (4) contributing to the preservation and maintenance of the natural diversity of individual species and habitats, and (5) providing undisturbed, reference sites against which we can evaluate the effects of fishing and other human activities on marine ecosystems."

According to Dr. Robert L. Shipp in his report to the Fishamerica Foundation, no-take MPAs "can have a strong beneficial impact for fishery management during periods of active spawning, when species may be especially vulnerable to harvest, and when certain components of the stock (e.g., large male gag grouper) may be disproportionately liable to capture...In instances where a stock is severely overfished and subject to little or no management, a [no-take] MPA can be used along with other measures to more rapidly replenish populations...Where habitats are damaged by fishing practices, establishment of [no-take] MPAs may help ensure habitat recovery...[No-take] MPAs may also be beneficial where ecosystem management is employed in fisheries (primarily of near sedentary species) where by-catch of non-targeted species has become excessive, or conversely, where a protected species has reached population levels which increase natural mortality rates..." Likewise, Dr. Ray Hilborn of the University of Washington's College of Ocean and Fishery Sciences noted in comments on proposals for marine reserves in the Sanctuary that, "...it is almost universally accepted that exploitation reduces population sizes.... No-take areas, so long as their size is large relative to the movement of the species, will lead to increased abundance within the reserve."

Comment 17: Adequate funding is not available to manage, monitor, and report on MPAs in the proposed project.

Response 17: The Department believes that adequate organizational resources exist to manage, monitor, and report on MPAs in the proposed project. The MLPA, with which this project must be consistent, expressly contemplates "management and enforcement measures[,] as well as provisions for "monitoring, research, and evaluation" as program

components. The Channel Islands region is unique California in that the area has benefitted, currently benefits, and is expected to continue benefitting from the resources and coordinated efforts of multiple State and federal agencies. Through existing and new MOUs the Department, CINMS, and Channel Islands National Park will assist in monitoring, enforcement, and management of these areas. Existing monitoring projects (listed in the Draft ED at p. 5-14) will continue to provide data on changes in various species abundances in the region. These programs will contribute to the ability of the various agencies to provide adequate monitoring. Interagency coordination will also result in more efficient use of Department resources. Department enforcement staff will develop an enforcement plan in cooperation with other public agencies where existing MOUs are in place to coordinate such efforts. Some of these agencies also provide funding through the MOUs, including the CINMS, Channel Islands National Park, NOAA Fisheries, and the United States Coast Guard. In addition to research by State and Federal agencies, other research organizations and institutions (e.g., University of California, California State Universities, and California Sea Grant Extension Program) will likely also provide research, monitoring and evaluation opportunities.

The MRWG also made recommendations on monitoring, management, and enforcement of MPAs (See Draft ED Appendix 3). The CINMS SAC is currently using its public process to discuss potential monitoring programs, develop an MPA monitoring plan, and coordinate State and Federal enforcement agencies. The SAC will use existing MPA monitoring and enforcement, such as that occurring in Florida as examples. Both the CINMS and Channel Islands National park contribute funding to help monitor resources and enforce regulations within the project area. This unique situation allows for additional patrol time and equipment in the area to help address enforcement concerns. The Department has stationed a new 54' enforcement vessel in Ventura that will be dedicated to the region and a second vessel in Dana Point that will have the ability to patrol the region. All of these factors will contribute to the successful implementation of the proposed project.

Comment 18: The economic loss to recreational anglers would be too great for the local industry. This would have the greatest impact on recreational anglers who rely on the sport fishing fleet for recreation.

Response 18: The Department disagrees. The comment assumes that recreational fishing effort will not be redirected to other areas, or that recreational fishing will not benefit from the enhanced resource that the project is expected to provide. The maximum potential loss estimated for charter boat fishing in the proposed project area is approximately \$2 million or 11% of the total income currently generated. This potential loss assumes that no replacement of areas currently fished are available and that no benefits accrue over time from the proposed MPAs, both of which the Department believes are unlikely. The maximum potential loss estimated for commercial fishing is more than \$3 million or nearly 12% of the total ex-vessel value currently generated. Thus, neither group (recreational and commercial fishermen) is likely to be impacted more than the other. In addition, this level of potential loss is not expected to have long-term consequences for the charter fishing industry. When compared to increases in other regulations, such as reductions in bag limits, species closures, and seasonal closures, this potential loss may be offset by the long term resource sustainability that MPAs are expected to provide. Charter businesses may actually see an increase in business and greater opportunities to provide year-round fishing as MPAs begin to replace other, more restrictive, management measures such as complete closures for species groups throughout the entire State. The recreational

anglers who rely on these boats to access the Channel Islands would also benefit from the more stable and sustainable resources. See also Response to Comment 5 regarding socioeconomic impacts.

Comment 19: There is no environmental disaster occurring in the CINMS that the creation of MPAs would cure. Many tools, sizes, seasons, and limits will work very well to maintain and improve fisheries while providing for the continuation of both recreation and an economically sound sport fishing industry.

Response 19: The Department disagrees. An "environmental disaster" need not exist before it is prudent to designate MPAs. Indeed, the Department believes that waiting for such a disaster before taking action is not responsible or prudent resource management.

Under the MLPA, with which the proposed project must be consistent, the goals and elements of the Marine Life Protection Program include sustaining, conserving and protecting marine life populations, as well as rebuilding those that are depleted. The Department believes that the proposed project advances all of these goals better than the other alternatives considered. The status of various fish and invertebrate species are described in Chapter 4 of the Draft ED. Continuing trends of decreasing populations for many species point to a need for new and different management strategies in addition to existing and traditional management. This is especially true for groundfish species (e.g., rockfishes) where population status is known to be very low with respect to historical levels. Declining trends in invertebrate populations have also been noted. Size limits, seasonal closures and bag limits do little to ensure the broad range of natural sizes and ages are maintained in a population. By removing the largest individuals and not protecting other sizes and species from bycatch, the long term sustainability of many populations has been damaged. Therefore, the Department believes MPAs will provide for a more complete management strategy that better provides for sustainable resources than would be obtained solely by relying on traditional fishery management tools. See also Response to Comment 4.

Comment 20: The document fails to consider a reasonable alternative of a limited, adaptive marine reserve process which would responsibly avoid unacceptable impact to the recreational sport fishing industry.

Response 20: The Department disagrees. The commenter did not articulate what is meant by "a limited adaptive marine reserve process," but appears to advocate an incremental approach consistent with the deferral alternative. The Draft ED includes an alternative to defer decision to the Marine Life Protection Act Process (see Draft ED at p. 6-64). The Department believes the alternative will not achieve the goals and objectives underlying the proposed action to the same degree as the proposed project.

The impacts of deferring any Commission action regarding MPAs in the Sanctuary to the ongoing MLPA process are unknown. Because this process could result in either the status quo (same as No Action) or new MPAs, it is not possible to predict potential environmental impacts (See Draft ED at p. 6-64). Certainly, deferral is not contemplated in the MLPA. The act, as noted in previous responses to comments, states that it is not intended to restrict any existing authority of the Department or the Commission to make changes to improve the management or design of existing MPAs or designate new MPAs. The proposed project falls squarely into this category.

Deferring any action to the MLPA process could diminish the benefits and dilute the high level of local involvement and input that occurred during the planning of the proposed project. From a socioeconomic standpoint, the potential economic impacts to local harbors and communities – and, more importantly, to local individuals as expressed during the planning process – may be diluted by the overall economy of California. Further, an incremental approach would not necessarily avoid socioeconomic impacts to recreational fishing, but would only draw them out. Finally, the Department believes that deferring any action to the MLPA process will not achieve project goals and objectives to the same degree as the proposed project.

The Department does not believe that socioeconomic impacts to recreational fishing from the proposed project are unacceptable. Again, the comment assumes that recreational fishing effort will not be redirected to other areas, or that recreational fishing will not benefit from the enhanced resource that the project is expected to provide. In any case, there is no authority for the proposition that a "recreational preference" governs marine resource management decisions (See Response to Comment 46). The range of potential socioeconomic impacts to the recreational fishing industry in the proposed project and identified alternatives is from about \$2 million to more than \$4 million dollars in income, or nearly 8% to more than 17% of the income currently generated in the project area. It is not possible to completely avoid short-term economic impacts, as any MPA proposal would have some level of potential socioeconomic impact to recreational anglers. As noted in Response 18, the Department expects that the long term resource sustainability provided by MPAs would outweigh the short term economic impacts. In addition, this sustainability is expected to reduce the need for other, more restrictive, measures such as complete closures for certain species in all State waters. While some areas may be fished with an MPA designation, complete closures obviously do not permit fishing and, as a consequence, such actions could result in much more serious consequences for the recreational fishing industry.

The No Action Alternative would not achieve project goals and objectives because it would result in the continuation of current habitat and population trends (See Draft ED, Chapter 4). As noted in the PFMC Phase I Technical Analysis of marine reserves (Parish et al. 2001), the estimated biomass of the majority of West Coast groundfish species have long-term downward trends. This is also true for some other species. For example, since 1985, abundances of harvestable red urchins (*Strongylocentrotus franciscanus*) have declined by 1% per year at fished sites on Santa Rosa and San Miguel Islands relative to non-fished reserve sites on Anacapa Island (S. Schroeter & D. Reed, analysis of NPS data). The commercial fishery for rock crab (*Cancer spp.*) has localized effects on crab abundance and size. Crab fishing areas intensively exploited over an extended period show a lower catch-per-trip and reduced size frequency distribution compared to lightly exploited areas (Leet et al. 2001). Very little is known about the long term status of many other stocks, including certain invertebrates and nearshore rockfish. Effective management of marine fisheries must take into account uncertainties about the status of stocks and the entire ecosystem supporting them, which is an integral component of the proposed project as recommended by the Department. The failure to take such an approach, in the Department's view, is to compromise ongoing efforts to rebuild overfished stocks and avoid other management actions that could have dramatic negative consequences for the fisheries.

Comment 21: Other management methods including "changing the size limit or limits... and support[ing] more fish hatcheries/habitat" should occur prior to any proposed closures.

Response 21: The Department disagrees. See Response to Comment 4.

Comment 22: Expresses general support for the proposed project.

Response 22: Comment noted.

Comment 23: Expresses general support for the proposed project.

Response 23: Comment noted.

Comment 24: Expresses general support for the proposed project.

Response 24: Comment noted.

Comment 25: Expresses general support for the proposed project.

Response 25: Comment noted.

Comment 26: Expresses general support for the proposed project.

Response 26: Comment noted.

Comment 27: The commenter supports a total fishing ban in 50% of all California waters.

Response 27: A 50% closure of all State waters to commercial and recreational fishing would not necessarily achieve environmental benefits superior to a more selective approach based on a combination of habitat representation and traditional fisheries management measures. The proposed project attempts to address a wide range of objectives, including both ecosystem biodiversity and limiting short term economic impacts. A total fishing ban over 50% of State waters would lead to significantly larger economic impacts than the proposed project. The Department believes that ecosystem protection can be provided through a network of smaller MPAs, as proposed, along with existing and new management measures that will lead to more sustainable resources.

Comment 28: States that no drifters, gillnets, seine nets or trawlers should be exempt from this total fishing closure.

Response 28: The proposed project is equally restrictive to these gear types as well as others and there are no exemptions. In one area, commercial lobster trapping would be allowed. This is based on the relatively low impact to other species and relatively healthy status of lobster populations. Drifters, gillnets, seine nets, trawl nets and other gear types would not be allowed in this area.

Comment 29: The commenter expresses support for the proposed project, but contends that the recommended network of reserves is "too small to adequately sustain marine resources" and that "only Alternative 5 is sufficient to achieve conservation of biological diversity and fisheries at the Channel Islands."

Response 29: See Response to Comment 10.

Comment 30: Expresses general support for Alternative 5.

Response 30: See Response to Comment 10.

Comment 31: Expresses general support for the proposed project.

Response 31: Comment noted.

Comment 32: The document could be improved by citing lack of peer-reviewed science predicting negative impacts of MPAs, as well as existing evidence suggesting that reserve establishment does not cause "congestion" impacts.

Response 32: The Department acknowledges the limited existing peer-reviewed research regarding potential negative impacts associated with the establishment of MPAs, including reserves. The Department, in this regard, is unaware of scientific studies that could be cited to support the notion that few studies and limited evidence exists on the subject. The existing analysis in the Draft ED, however, is based on and relies, in part, on peer-reviewed scientific studies; at least to the extent such studies exist. The existing analysis and references to the scientific literature relied on by the Department in the Draft ED are found at pages 1-14 through 1-16, and pages 5-17 through 5-18. In addition, revisions to Chapter 5 in the Final ED provide additional analysis and information addressing the issue of whether the proposed project will result in significant adverse environmental impacts associated with "congestion" (Sections 5.3.1.1, pages 5-17 through 5-19, and 5.3.2.1, pages 5-33 through 5-35). See also Response to Comment 5.

Comment 33: The final document should list Alternative 5 as the preferred alternative.

Response 33: The Department disagrees. The proposed project best meets all of the stated goals and objectives identified in the Draft ED. Likewise, the Department does not believe that Alternative 5 is environmentally superior to the proposed project. See Response to Comment 10.

Comment 34: Alternative 5 provides the most significant benefit.

Response 34: The Department disagrees. See Response to Comment 10.

Comment 35: The proposed project does not meet the conservation goals due to a lack of full habitat representation in all bioregions.

Response 35: The Department disagrees. Among all the alternatives identified in the Draft ED, the proposed project includes the highest number of habitats at a level of 20% or more. In particular bioregions this representation is significantly lower. In some cases this is due in part to the extremely small amount of an individual habitat available (e.g., less than 2 nm² of total kelp forest habitat in the Californian bioregion). It should be noted, however, that the MPAs in the proposed project are intended to work in conjunction with other fisheries management measures. These other measures will help complete necessary resource protection. See also Response to Comment 10.

Comment 36: The proposed project does not incorporate an “insurance factor”, nor do any alternatives except Alternative 5.

Response 36: The Department disagrees that “only” Alternative 5 includes an “insurance factor and multiplier,” thereby meeting the “Ecosystem Biodiversity Goal.” While the proposed project does not incorporate an explicit insurance factor, the proposal includes protective measures that, as a practical matter, achieve the same results. These other measures include spill response plans and vessel traffic separation schemes, which help prevent and respond to other threats from spills or other human catastrophes. The distribution of MPAs in multiple areas around the islands is designed to limit the impacts of single events on all reserves at once. Thus, while the proposed project was not increased in overall size in order to meet the Ecosystem Biodiversity Goal, it achieves the goal through other mechanisms. In addition, as noted in Response 10, the proposed project represents more individual habitats at a higher percentage than Alternative 5. It is thus more likely to meet ecosystem goals (See Draft ED pages 5-30 and 5-31).

Comment 37: The proposed project, Alternatives 4 and 5, and to a limited extent Alternative 3 have potential for connectivity.

Response 37: The Department agrees.

Comment 38: The proposed project, Alternative 4, and 5 allow potential monitoring using existing Kelp Forest Monitoring Sites.

Response 38: The Department agrees.

Comment 39: Alternative 5 best meets the goal of long-term sustainable fisheries while minimizing short-term economic impacts. The Science Advisory Panel already considered minimizing economic impacts in their recommendation and thus, in order to meet both goals an alternative must fall within the SAP’s recommended range of 30-50%.

Response 39: The Department disagrees with this statement. The SAP, in making its recommendation, used two MRWG Goals: sustaining fisheries and ecosystem biodiversity. The SAP did not use the goal of minimizing short-term economic impact in their deliberations or recommendation. In addition, as noted in Response 10, the proposed project represents the same number of individual habitats (five) at a level of 30% or greater, and more habitats (12 compared to 11) at a level of 20% or greater than Alternative 5. The Draft ED describes another method to compare the alternatives with respect to the goals of ecosystem biodiversity and minimizing economic impacts on page 6-69 and in Table 6-58. This method provides a ratio of the amount of habitat set aside to the maximum potential economic impact (habitat representation per dollar impact). The proposed project has a higher ratio of habitat representation per dollar impact than Alternative 5 and therefore is better at minimizing cost while maximizing habitat representation (a proxy for protecting species). See also Response to Comment 10.

Comment 40: More treatment should be given to the potential negative impacts of the No-Project (No Action) alternative and Alternatives 1, 2 and 3.

Response 40: See Response to Comment 20 regarding the “No-Action” Alternative. Alternatives 1, 2, and 3, while less likely to meet the goals and objectives of the proposed project, would not likely result in negative environmental impacts. Because each of these alternatives increases the area currently protected in MPAs, they would have at least minor localized benefits. Alternative 1 is not expected to meet the goals of sustaining resources or representing habitats. Certain critical habitats are excluded from this alternative and there is no representation in the far eastern side of the Islands. Similarly, Alternatives 2 and 3 lack certain critical habitats and do not adequately represent most habitats. The impacts of deferring the decision to the MLPA process are unknown. Because this process could result in either the status quo or new MPAs, potential impacts are largely speculative. It bears emphasis that the No Action Alternative would not meet the goals and objectives of the proposed project; in particular the MRWG and MLPA goals of protecting representative habitats and ecological processes, maintaining areas for cultural and natural heritage, and providing for education and research within MPAs. These goals, taken together, require spatially explicit areas protected from all extractive use for sustained time periods, which can not be accomplished by existing regulations.

Comment 41: Expresses general support for the proposed project.

Response 41: Comment noted.

Comment 42: Expresses general support for the proposed project.

Response 42: Comment noted.

Comment 43: The FAA has no comments at this time.

Response 43: Comment noted.

Comment 44: The document assumes project-related socioeconomic impacts are negligible.

Response 44: The Draft ED does not deem project-related impacts negligible for purposes of CEQA. Instead, the Draft ED notes that social and economic effects are not considered environmental effects for purposes of CEQA. (Draft ED, Section 5.4.1, p. 5-43.) The Draft ED, nevertheless, provides a social and economic overview of the "Human Environment" in and around the area of the proposed project in the "Environmental Setting" section of the document, as well as analyzing related economic impacts. (Draft ED, Sections 4.4, 5.4.1-5.4.2, pp. 4-133 to 4-169, 5-35 to 5-55.) Against this backdrop, information in the Draft ED indicates that project-related social and economic effects will not result in significant, adverse environmental impacts. See also Responses to Comments 5 and 12.

Comment 45: The document assumes MPAs will protect areas from oil spills.

Response 45: The Draft ED does not make this assumption. It notes that an MPA network design should include multiple sights over a broad area to prevent a catastrophic event such as an oil spill which might impact multiple reserves at the same time (See Draft ED, Section 5.3.1, p. 5-15). See also Response to Comment 4.

Comment 46: The document is flawed because it puts marine reserves and commercial fishing ahead of the constitutionally protected interests of recreational anglers.

Response 46: The Department disagrees. There is no authority for the proposition that a constitutional "recreational preference" governs marine resource management decisions. The provision of the California constitution to which the commenter refers has been considered by the courts in the context of both recreational and commercial fishing. Further, the California Supreme Court has ruled that the power to regulate fishing has always existed as an aspect of the inherent power of the Legislature to regulate the terms under which a public resource may be taken by private citizens. This regulatory power applies to both recreational and commercial fishing: both the MLPA and the MLMA contemplate regulation of commercial and recreational fishing without expressing a preference for either. Nevertheless, the Draft ED and the proposed project do not place a higher priority on marine reserves and commercial fishing, as compared to recreational anglers. The proposed project, for example, includes areas where certain recreational activities (e.g., lobster diving or pelagic fishing) are allowed while commercial activities are not. In this respect, the Department is recommending this and other pro-recreational angler components of the proposed project because the Department believes that recreational activities in certain specific areas are not contrary to the purpose of these individual sites. Moreover, the proposed project is intended and designed to provide sustainable fishery and marine resources in the long term, which will necessarily benefit recreational anglers generally, including in areas outside MPAs

Comment 47: The document does not address the problems of displaced effort or congestion of effort outside reserves.

Response 47: The Department disagrees. The Draft ED addresses the prospect that the proposed project will cause congestion of fishing efforts outside the proposed reserve system in Section 5.3.1, at pages 5-17 and 5-18. Potential project-related environmental impacts outside the proposed reserves are discussed in Section 5.3.2.1, at pages 5-31 and 5-32. Additional Information added to Chapter 5 in the Final ED provides further discussion regarding this issue. In contrast to the comment, alleged fishing congestion is not "looked at" in the Draft ED "as proof of a 'spillover' benefit." Instead, the Draft ED indicates that the "net effect of reducing [fishing] effort" as a result of various recent fisheries management actions, "while closing some areas to fishing" under the proposed project, "should limit the possibility for congestion outside the MPAs." In the Department's view, potential project-related "congestion" or "displacement" effects are expected to be less than significant under CEQA. Consistent with the adaptive management component of the proposed project, as required by the MLPA, ongoing monitoring, research and evaluation after project approval, will provide information regarding post-approval environmental conditions. This information, along with the Department's authority to recommend additional management measures to the Commission, will ensure that approval of the proposed project does not result in any significant environmental impacts. See also Response to Comment 5.

Comment 48: The Marine Reserves Working Group Science Advisory Panel created their own mandate.

Response 48: The Department disagrees. The SAP process occurred in a transparent, public manner. The MRWG, a broad based constituent panel, directed the SAP to come up with a recommendation on reserve size based on two consensus goals (one

for fisheries sustainability and one for ecosystem biodiversity). The SAP reported their results back to the MRWG and responded to MRWG questions and concerns.

The constituent involvement process lasted more than two years. To facilitate public participation, the MRWG sponsored three large public forums in Santa Barbara and Oxnard. Additionally, the SAP hosted over a dozen public meetings in Ventura and Santa Barbara Counties. Thus, while meeting locations reasonably focused on areas near the project area, interested resource users from adjacent areas such as Los Angeles still had ample opportunities to participate. Opportunities for involvement by interested constituents continued through Fish and Game Commission meetings in Los Angeles County during and after the MRWG process. Several of these meetings included public comment on Channel Islands MPAs. In addition, attendance records from public meetings held specifically for the MRWG process indicate participation from Los Angeles County residents. The socioeconomic surveys included sampling in the port of San Pedro, and a complete census of charter boats that access the Channel Islands, including Santa Barbara Island.

Though the MRWG could not reach consensus on a particular MPA alternative, its input and detailed information provided significant guidance to the Department in drafting the project. The Department and CINMS developed a draft preferred alternative (proposed project) at the direction of the SAC after the MRWG forwarded their results. The draft proposed project was based on the information, goals, and objectives developed by the MRWG. This draft was released to the MRWG and public at large for comment and review. The Department revised the initial draft based on that input, and then subjected the revised proposal to yet another round of review by the MRWG and public. Information on that final comment and review has been added to the description of the MRWG process in Appendix 3 of the Draft ED, as are the MRWG goals and objectives.

Comment 49: Expresses general support for the proposed project.

Response 49: Comment noted.

Comment 50: Chapter 4 provides the appropriate baseline.

Response 50: Comment noted.

Comment 51: The document does not address the potential impact of status quo.

Response 51: See Response to Comment 20 regarding "No Action" Alternative.

Comment 52: The rationale for rejecting the alternative to defer to the MLPA is not clear.

Response 52: See Response to Comment 20 regarding "Deferral" Alternative.

Comment 53: The document does not address the problems of displaced effort in particular the potential for habitat effects.

Response 53: See Response to Comment 5.

Comment 54: Information on the specific level of effort and displacement is necessary to determine the relative impacts.

Response 54: Spatially explicit data on use are scarce for California as a whole, as well within the project area. The numbers provided in the Draft ED for maximum potential loss to consumptive users is one way to gauge potential displacement. This does not, however, show the number of vessels that might be forced into closer proximity on a given day. The Department has added spatially explicit data on use to the document to help show the level of displacement each reserve might cause. This information can be found on page 5-32 in the Final ED. See also Responses to Comments 5 and 16.

Comment 55: The document's threshold of significance for habitat representation is not adequately explained.

Response 55: The threshold of significance for biological impacts is defined on page 5-6 of the Draft ED as “any impact that has the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of an endangered, rare, or threatened species, or eliminate important examples of the major periods of California history or prehistory.” Consistent with CEQA, this significance threshold serves as a gauge or measure to assess whether project-related impacts on biological resources are significant. The Department, in this respect, believes the threshold of significance is adequately explained. The comment appears, in part, to confuse CEQA's obligation to establish a significance threshold for project-related environmental impacts with the Department's recommendation regarding reserve size, as compared to the SAP's recommendation. The CEQA threshold of significance for biological resources, as noted above, is clearly articulated in the Draft ED at page 5-6. The comment, in contrast, refers to the criteria used for “the purpose of comparison” of habitat representation found discussed in the Draft ED in Section 5.3.1 on pages 5-6 through 5-18. These criteria were used in order to examine the relative biological benefits of the proposed project and each alternative, not (as in the case of the significance threshold) the potential for project-related environmental impacts. Chapter 5 has been reorganized and minor editorial corrections made to make this difference more apparent.

Comment 56: Beyond the issue of size, the SSC notes that habitat representation is a fundamentally sound approach to determining which areas to place in reserves for protecting biodiversity.

Response 56: Comment noted.

Comment 57: Substantial fisheries benefits on a stock-wide scale are unlikely to result under any of the MPA alternatives at CINMS. More specifically, the arguments for expected fisheries benefits (pp. 6-66, 6-67 and Figure 6-1) are technically weak and not compelling.

Response 57: The Department agrees that stock-wide benefits are difficult to predict and may not occur. This is in part true because the study area was limited to the Sanctuary boundaries. However, this was not identified as an objective or goal of the MRWG process (see Draft ED Appendix 3, p A3-7). The Department also agrees that the statements made on the referenced pages and the figure used as an example by the commenter were difficult to understand. Given that they were not necessary in determining the potential for negative environmental impacts or in developing the

criteria for comparison of alternatives, these statements and graph were removed from the final document.

Comment 58: The SSC agrees 1996-1999 is a reasonable baseline period for commercial fisheries. The SSC agrees with the assessment that activities within the CINMS account for less than 1% of total income and employment in the seven county area of impact.

Response 58: Comment noted.

Comment 59: The SSC requested documentation be added to the Draft ED (or at least the socioeconomic analysis) regarding how consumer surplus estimates were derived.

Response 59: The estimations of consumer surplus were developed by Leeworthy and Wiley and described in their report (Leeworthy and Wiley 2002). Though, the Department feels the justification for these estimates is adequately described in their report, Leeworthy and Wiley have also sent a specific response to this and other comments to the SSC. Leeworthy and Wiley's response is included in the Final ED as Appendix 7. Changes in the estimates of consumer surplus would not alter the potential impacts to the natural environment described in the Draft ED. See also Response to Comment 12.

Comment 60: The SSC considers the estimates of profits for the party/charter sector quite reliable.

Response 60: Comment noted.

Comment 61: It is not clear to the SSC why the value of fisheries at Tortugas should be a reasonable proxy for the value of fisheries at CINMS.

Response 61: The estimates of consumer surplus were developed by Leeworthy and Wiley and are incorporated in the Draft ED by reference. The method for determining this number is described on page 108 of Leeworthy and Wiley, 2002. They note that their estimates are not technically correct in that they overstate the commercial fishing values. Even so, since the same estimates were used for all alternatives, their use for estimating relative socioeconomic impacts among alternatives is still valuable. See also Response to Comment 12.

Comment 62: In order to apply the results used to determine elasticities (0.04, 1.0, and 4.5) for potential increases in recreational quality, it is necessary to make unsubstantiated assumptions.

Response 62: The Department acknowledges that these types of estimates are highly subjective. They were used as a general reference in order to compare economic impacts among Alternatives. Since the same range of elasticities was used for each alternative, the relative socioeconomic impacts are useful, if not exactly precise. See also Response to Comment 12.

Comment 63: The SSC expresses several reservations regarding the estimation of non-use values and the net benefits assessment found in Chapter 6 of the Draft ED. They also suggest that the benefits and potential costs of monitoring, research, and management should be analyzed.

Response 63: The Department appreciates this comment. The net benefit assessment was not critical to the development or comparative analyses of the proposed project. Section 6.8.2 of the Draft ED has been revised to more clearly represent potential costs and benefits in a qualitative manner. Quantitative references to potential benefits have been removed in the Final ED. See also Response to Comment 12 and Response to Comment 182 regarding passive use values.

Comment 64: The proposed project may have local benefits and, as part of a larger system, may help provide stock-wide benefits.

Response 64: The Department agrees.

Comment 65: Substantially more scientific work is needed before proceeding.

Response 65: The Department disagrees. See Response to Comment 16.

Comment 66: One impact may be displacement of effort into the albacore fishery.

Response 66: The Department believes any such impact will be less than significant under CEQA. See Response to Comment 5. The Department also notes that the PFMF will have jurisdiction over the albacore fishery when the Highly Migratory Species FMP is adopted, which is expected to occur in November 2002, and regulations are implemented in 2003. The Department will provide management input and coordinate with the PFMF to the extent feasible, which will help ensure that any project-related impacts to the albacore fishery remain less than significant.

Comment 67: The document fails to consider the body of opinion that finds only theoretical basis for a 30-50% set aside.

Response 67: As noted in Response 16, the MLPA does not require scientific certainty prior to acting. Instead, any MPA-related decisions must be based on the best readily available science. Scientific theory and theoretical studies in the absence of empirical evidence form the basis of best readily available science. The Department, in this respect, relied on more than the single recommendation of a 30-50% set aside to develop the proposed project. The Department relied on a much broader spectrum of scientific input, as well as existing and new fisheries management strategies. See also Response to Comment 48.

Comment 68: A minority of the (PFMF Coastal Pelagic Species Sub-panel) advisors generally supports the proposed project.

Response 68: Comment noted.

Comment 69: Asked the Commission to look at the cumulative impacts of State and Federal actions on economics of other regulations as well as MPAs.

Response 69: Economic and social impacts are not environmental impacts per se under CEQA. See Responses to Comments 5 (regarding socioeconomic impacts), 76 (regarding recent groundfish closures), and 107 (regarding cumulative impacts).

Comment 70: Sport fishing only takes 3 to 6% of the total compared to commercial. Fisheries like trawl should be eliminated and we wouldn't need closures. Traditional management including size limits and slot limits would be better.

Response 70: The Department disagrees. See Responses to Comments 4 (regarding other management measures), 8 (regarding the proportion of fish taken), and 9 (regarding commercial regulation).

Comment 71: The commenter submitted several scientific papers that he felt supported Alternative 2 and the concept of holistic management.

Response 71: See Response to Comment 40 regarding Alternative 2.

Comment 72: The commenter expressed concern for the disproportionate impact to individual fisheries, particularly the red crab fishery.

Response 72: The Department does not feel that displaced effort in the red crab fishery will result in negative impacts to the environment (See Response to Comment 5). The commenter refers to "fisheries" in the context of commercial fishing or harvesting populations of marine fish. The Department disagrees that mitigation to such fisheries is required. "Mitigation" referenced in the Draft ED is in relation to environmental impacts to the resource, not the socioeconomic activities related to that resource. The commenter suggests that the two areas where the red rock crab fishery takes place are the Santa Cruz channel between Santa Rosa and Santa Cruz Islands and the North side of San Miguel Island. The maximum potential economic impact to the crab fishery for the proposed project is estimated at 14.8% of annual income; 5% of this economic impact is generated within the proposed Carrington Point State Marine Reserve on Santa Rosa Island. This estimate is based on input received from fishermen in the project area. Particular areas, such as the offshore area to the northeast of San Miguel Island and within the Santa Cruz Channel east of Santa Rosa Island, were excluded in order to reduce potential economic impacts to this fishery as suggested by user groups. According to the "exclusion zones" maps developed by commercial fishermen in the socioeconomic survey, the most valuable locations also include the south side of San Miguel and Santa Rosa Islands (Leeworthy and Wiley 2002). In addition, they show that the most valuable areas are farther east in the Santa Cruz channel than the MPAs proposed for that area. According to Department landing data, rock crab is caught in all blocks surrounding the northern Channel Islands. Nearly 80% of this is caught on the north side of Santa Rosa Island and the South Side of San Miguel Island. Less than 2% is caught on the north side of San Miguel Island.

Comment 73: The Cape Canaveral experience shows that closed areas have very positive impacts on recreational fisheries.

Response 73: The Department agrees.

Comment 74: Even though there is no fishing allowed for abalone they haven't recovered. This is proof that MPAs do not work.

Response 74: The Department disagrees. The commenter is referring to a fisheries management measure that prohibits the take of abalone. This type of species specific regulation can not replicate the entire ecosystem protection provide by an MPA. It is, in fact, a good example of why single species protection alone may not function effectively

for the goal of rebuilding depleted stocks. Other species that interact with abalone, such as sea urchins and sheephead, are still taken in locations where abalone are protected. The interactions between all these species can not occur in an undisturbed manner unless all are protected. MPAs may, in fact, provide additional benefits that do not currently occur.

Comment 75: The document fails to adequately represent the level of public support for a large network of no-take reserves.

Response 75: The Department disagrees. The Department feels that the proposed project adequately reflects the range of views expressed during the public process. These views included advocates for both higher and lower sizes of MPA networks. The proposed project attempts to balance those views while still achieving the project goals. The extensive public participation process is documented in the Draft ED at Appendix 3.

Comment 76: More specific characterization of the importance of the nearshore marine environment of the study area should be developed in light of recent fishing closures, and the threat these closures pose to the marine life of the study area.

Response 76: The Department agrees that recent groundfish management activities may create a need for more attention on nearshore habitats. The Department believes that the proposed project adequately characterizes the nearshore marine environment (see Draft ED at 4.3, "Biological Environment"). The reference to "recent fishing closures" is to the emergency action taken by the PFMC to close the continental shelf between 20 and 150 fathoms to all fishing for groundfish in July 2002. The PFMC formalized this action in September 2002, with strict gear restrictions for fishing in this range. The scale of this action (100% of the shelf closed to activities that impact groundfish) implicates a need to address potential shifts in fishing activities. Some of this has already occurred through regulations promulgated by the PFMC and Commission that will close all nearshore areas to fishing for rockfish, lingcod, cabezon, and greenlings for six months of the year, coupled with increased restrictions on recreational daily bag limits. The PFMC has made adjustments to commercial trip limits for minor nearshore rockfish, and the Commission will be considering additional regulations. The Nearshore Fishery Management Plan (FMP) establishes Total Allowable Catch levels for both commercial and recreational fishing for State managed species. In addition, under the Nearshore FMP a restricted access program is under development. These changes, along with other ongoing management that limits the amount of take allowed, are noted in the Draft ED on page 5-18 as rationale for the proposed project not leading to significant congestion related impacts. Even so, the shelf closure may suggest an even greater need for establishing MPAs in nearshore habitats to guard against potential reductions in populations as the nearshore becomes even more important for consumptive users. Therefore, the shelf closure does not change the Department's position on the proposed project.

The shelf closure does not, however, provide equal protection in deeper habitats to the proposed MPAs and should not be considered a surrogate. Various fisheries and gear types are still allowed to fish on the shelf under then new PFMC regulations. Thus, the ecosystem protection provided by an MPA is not provided by this closure. The closure will be reviewed annually and could be modified or removed if new population estimates are developed. MPAs in the area would be more lasting and could remain in place if the shelf closure is lifted, maintaining an adequate amount of habitat protected to meet the variety of goals addressed in the proposed project.

Comment 78: The proposed project cannot protect kelp ecosystems in the California and Oregonian biogeographic provinces.

Response 78: The Department believes the proposed project adequately protects kelp ecosystems. Overall, the proposed project establishes reserves to protect 21% of the existing kelp habitat in the Channel Islands National Marine Sanctuary, which includes kelp in the biogeographic provinces identified by the commenter. Additional kelp beds in the project area are also protected by the nature of the environment, particularly wash rocks or pinnacles near the surface that preclude harvesting because of limited or non-existent vessel maneuverability in these areas. Thus, while only 21% of the total habitat is contained within proposed reserves, more of the area is unharvestable and thus not in need of additional protection. Taken together, the Department believes the "proposed reserve scenario" as described by the commenter does, in fact, protect a significant portion of the kelp ecosystems in the California and Oregonian biogeographical provinces.

Comment 79: Quality habitats are not included in the proposed project, in particular high quality nearshore habitats less than 20 fathoms deep. Some of these habitats may be cut by the Department to support the short-term interests of commercial and sports fishing industries.

Response 79: The Department disagrees. Due to the subjective nature of determining habitat quality, the proposed project instead focused on including a wide variety of habitats. One way of determining the relative value of an individual area is to consider the number of habitats within that single area (habitat heterogeneity). Figure 8-1 depicts the overlap of the proposed project and areas of highest habitat heterogeneity. These areas include breeding sites, marine mammal haul outs, rare habitats, and critical habitats for various species of interest all of which are included in the proposed project. With respect to nearshore habitats, the proposed project includes between 28% and 34% of all habitats shallower than 30 m (16 fathoms) within the Sanctuary. This is relatively high representation as compared to any of the other alternatives. With respect to the comment that the Department may "cut" some of these habitats, the Department is not recommending any such action and approval of the proposed project, any alternative, or combination thereof is in the discretion of the Fish and Game Commission.

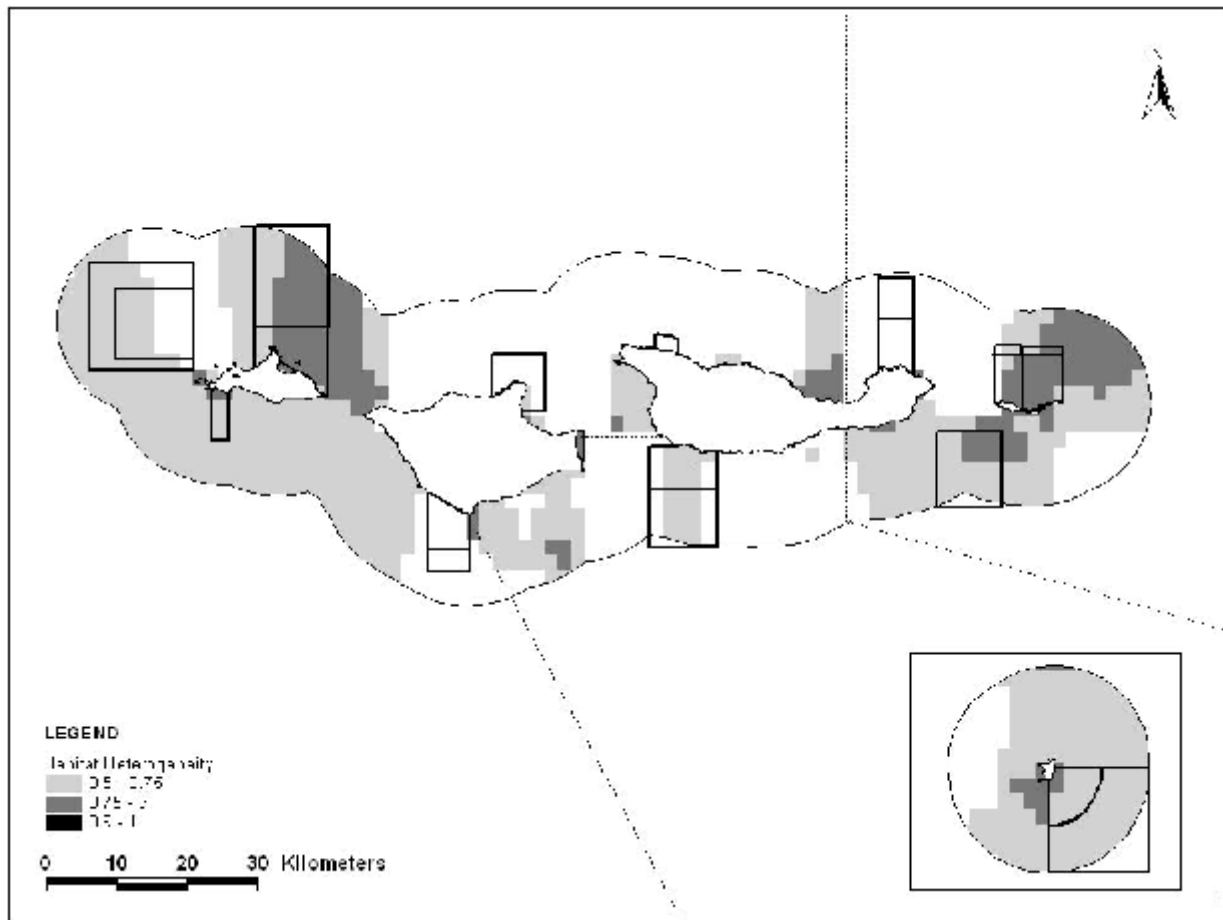


Figure 8-1. The summed results of habitat analysis showing areas of high habitat heterogeneity.

Comment 80: It makes sense to first implement MPAs at the Channel Islands and then continue with the rest of the Southern California Bight. That is, in fact, phasing in of MPAs.

Response 80: The Department agrees with the approach of implementing MPAs at the Channel Islands prior to the rest of the coast. The Draft ED states on pages E-3 through E-4 that “a timely decision will provide needed insight and experience in the implementation of reserves before the MLPA suggests MPAs for the entire State.” While this could be considered a form of phasing, the Department notes that no project is proposed at this time for the rest of the State, so subsequent phases are not known or guaranteed. Another form of phasing is the Federal waters phase as discussed in the Draft ED. For the proposed project, a specific proposal to expand MPAs into Federal waters exists and has been discussed with respect to cumulative impacts. See also Response to Comment 15.

Comment 81: Additional kelp forest habitat should be included.

Response 81: The Department disagrees. See Response to Comment 78.

Comment 82: Licensed launches from the California Spaceport are not mentioned in the Draft ED and (MPAs) may affect the commercial launch industry.

Response 82: The Draft ED relates only to the proposed project for Marine Protected Areas around the Channel Islands. The comment appears to confuse the MPA issue with that of the National Marine Sanctuary's management plan revision, a separate Federal process. While Vandenberg Air Force Base and the California Spaceport are near the project area, the proposed project would have no impact on existing regulations regarding space launches or the commercial launch industry. Marine Protected Areas, if adopted, will be created through the authority of the Fish and Game Commission. The specific regulations for MPAs are stated in the proposed regulations as prohibiting activities that would "injure, damage, take, or possess any living, geological, or cultural marine resource..." (Proposed Section 632, Title 14, California Code of Regulations). Space launches at the California Spaceport, located approximately 25 nautical miles from the nearest proposed MPA, would not be expected to lead to resource injury, damage, take, or possession. The proposed project does not change the boundaries of the Channel Islands National Marine Sanctuary. The Department, in this respect, also does not believe that the proposed project may affect "licensed launches" from the identified facilities.

Comment 83: Appears to advocate a "No Action" alternative in favor of recreational fishermen.

Response 83: See Response to Comment 20 (regarding No Action) and Comment 46 (regarding recreational preference).

Comment 84: The document provides inadequate information on the impacts of the status quo.

Response 84: See Response to Comment 20 (regarding No Action).

Comment 85: The goals and objectives for individual sites are not provided, nor a discussion of why the overlap map was enlarged.

Response 85: The Department disagrees. Chapter 5.3.2.1 describes the habitats and/or species represented in each MPA in the proposed project. This information can be used to show how each MPA helps fulfill the goals of the project as a whole as well as how the individual MPAs are intended to function as a network. While the areas of overlap do represent agreement on specific sites that might be included in an MPA network, they do not represent agreement from all sides on a proposed network. Some of the MRWG members felt that this map would need to be increased to include representative habitats in all bioregions. The Department's proposed project attempts to meet the goals provided by the MRWG, as well as those in the MLPA, and is therefore different from the overlap areas.

Comment 86: In order to fully evaluate the costs and benefits of proposed networks the entire State process should proceed at the same time.

Response 86: The Department disagrees. The comment refers to including the Channel Islands decision in that for the MLPA Master Plan process regarding the entire State (the defer alternative). See Response to Comment 20 regarding the defer alternative.

Comment 87: The document does not adequately discuss the potential impacts of effort displacement.

Response 87: The Department disagrees. See Responses to Comments 5 and 47.

Comment 88: The document's threshold of significance for habitat representation is not adequately explained.

Response 88: The Department disagrees. See Response to Comment 55.

Comment 89: The document fails to address the concerns of scientists who disagree that MPAs are the only cure for perceived ills, particularly those related to fishery management.

Response 89: The Department agrees that MPAs are not the only tool available to fisheries managers. See Response to Comments 4 and 16.

Comment 90: Constituent involvement in MPA planning is essential.

Response 90: The Department agrees. See Response to Comment 48 and 75.

Comment 91: Asserts that MPAs are a valuable tool, but disputed by most fisheries scientists.

Response 91: The Department disagrees. See Response to Comments 4 and 16.

Comment 92: Marine reserves will do little toward achieving optimum yield for epipelagic and migratory species.

Response 92: MPAs provide epipelagic and migratory species with limited benefits due to their migratory nature. Epipelagic and migratory species do, however, fulfill an ecosystem role within MPAs as predators on and forage for other species. MPAs can also contribute to achieving sustainability by providing protection to epipelagic or migratory species when they are aggregated for breeding, feeding or other purposes.

Comment 93: A single percentage set aside will not work in all cases.

Response 93: The Department agrees with this statement. The proposed project was designed for the specific case of the project area. It is intended to function within the framework of existing and planned management measures as well as the status of species in the area. In other cases a different percentage set aside may be required.

Comment 94: Dense populations within reserves do not necessarily lead to increased catches in surrounding waters.

Response 94: The Department disagrees. Many studies have shown either increased catches or increased numbers of fish and invertebrates adjacent to Marine Protected Areas. These results would not be expected for highly sedentary species that do not move out or transport larvae out of an MPA, or for migratory species that do not spend a significant portion of time within MPAs. The Department believes that those species with large enough home ranges or larval dispersal will spillover into adjacent areas. See also Response to Comment 5 regarding production increases.

Comment 95: Existing reserves and those proposed have been established without baseline studies.

Response 95: The Department agrees that many existing MPAs were established without baseline studies. Indeed, one of the express functions of MPAs in the MLPA Program is the provision of baseline information. Also, the MLPA provisions regarding adaptive management clearly contemplate the establishment of MPAs, even in areas of scientific uncertainty. However, that is not the case with the proposed project which has some available baseline data. Likewise, the Department believes the Draft ED provides sufficient, detailed information regarding the environmental setting in and around the area of the proposed project, and that this "baseline" is adequate to assess potential project-related significant effects under CEQA. See Response to Comment 16.

Comment 96: Management may need to include a variety of options including selective fishing.

Response 96: The proposed project includes two areas where selective fishing would be allowed. The first would allow both commercial and recreational lobster fishing and recreational pelagic fishing. The second would allow only recreational lobster and pelagic fishing. In these cases, the allowed activities are consistent with the level of protection envisioned and would allow for some fishing activity to occur while providing additional protection for resident fish and invertebrates. See also Response to Comment 16 regarding adaptive management.

Comment 97: The Primary emphasis should be on protection of valuable and vulnerable areas, rather than on achievement of a percentage goal for any given region.

Response 97: The Department agrees. The NRC, in their report Marine Protected Areas: Tools for Sustaining Ocean Ecosystems concluded, among other things, that "...the complete spectrum of habitats supporting marine biodiversity should be included with emphasis on safeguarding ecosystem processes" (NRC 2001). The NRC also states that for the goal of protecting a sufficient fraction of marine habitats "...the primary consideration...should be the needs of each biogeographical region based on protecting critical habitats (such as spawning grounds, nursery grounds, or other areas harboring vulnerable life stages) and special features (such as seamounts, hydrothermal vents, and coral reefs)" (NRC 2001). This approach is consistent with that used by the Department in developing the proposed project (See Response to Comment 79). Due to the subjective nature of determining habitat quality, the proposed project instead focused on including a wide variety of habitats. Figure 8-1 depicts the overlap of the proposed project and areas of highest habitat heterogeneity. These areas include breeding sites, marine mammal haul outs, rare habitats, and critical habitats for various species of interest all of which are included in the proposed project. This is also noted in the descriptions of the biological impacts of individual reserve sites in Chapter 5 of the Draft ED. Percentage calculations were used to determine the relative level of habitat representation among alternatives not as a goal. These calculations also provided an index of how well particular alternatives would be expected to perform based on available biological information.

Comment 98: The potential economic and ecological benefits of marine reserves will not be realized without a sufficient commitment to enforcement and monitoring.

Response 98: The Department agrees. Suggestions for management, monitoring, and enforcement were provided by the MRWG (See Draft ED, Appendix 3 on pages A3-8 through A3-11). See also Response to Comment 17.

Comment 99: The SSC considers the choice of reserve size to be a policy decision.

Response 99: The Department agrees. This comment refers to the recommendation for reserve size (30-50% of each habitat type) made by the MRWG SAP. The comment refers to this recommendation to illustrate the fact that the SAP combined two goals (ecological and fisheries) and weighted them equally without direction from the MRWG on how to weight the goals. The SSC felt weighting the goals was a policy decision. It should be noted that the Department, in developing a policy recommendation for the Commission, chose to use a significantly smaller overall size (19% of State waters) and based its criteria for habitat comparison on other scientific recommendations as well (20% or more as “adequate”). The Fish and Game Commission will make the ultimate policy determination for MPAs in the project area.

Comment 100: Substantial fisheries benefits on a stock-wide scale are unlikely to result under any MPA alternative.

Response 100: The Department agrees. Most fish stocks found in the project area represent only a minor portion of the entire statewide stock. While stock-wide benefits would not be expected, local populations are expected to increase. It is this local significance that reinforces the idea of using a regional approach. The proposed project will benefit only local populations, but could become a part of a more comprehensive network that could benefit entire stocks. See also Response to Comment 57.

Comment 101: It is not possible to draw any conclusions regarding the relative costs and benefits of marine reserves.

Response 101: The Department disagrees. The long term environmental benefits of MPAs are clear and these benefits support the projects goals and objectives. The MLMA emphasizes that the long-term health of marine resources should not be sacrificed for short-term benefits. This is consistent with the proposed project's goals. The economic analysis developed for the proposed project is much more detailed than for most fisheries management decisions. Even so, comparisons of potential short-term costs and potential long-term benefits from a purely economic perspective are difficult because each involve estimates of how human behavior may change in response to the proposed project. The existing discussion acknowledges these limitations and provides a thorough analysis nonetheless. See Response to Comment 12.

Comment 102: The new de facto reserve established through the groundfish closures must be considered.

Response 102: See Response to Comment 76.

Comment 103: Reserves do not address the prospect of sea otter emigration into southern California.

Response 103: MPAs will not prevent the impacts of natural events or natural interactions between species that may lead to declines in some populations. The natural ecological interactions between predator and prey species are critical to the

function of an MPA. While sea otters are a particularly voracious predator of many marine invertebrates, they do coexist with their prey species in abundances that allow prey populations to persist. These population levels may, as in the case of abalone, be significantly lower than in the absence of otters. Although otters may reduce localized invertebrate populations, any such reduction would be a return to the balance that existed prior to otter removal.

Comment 104: The Department has segmented the project in violation of CEQA sec. 15165. The implementation of the MLPA is foreseeable and should have been the full project reviewed in the draft Document.

Response 104: The Department disagrees that focusing environmental review on the proposed project, as opposed to implementation of the MLPA as a whole, violates CEQA's proscription against "piecemealing" or "segmented" environmental review. The MLPA directs the Commission to reexamine and redesign California's MPA system through the adoption a Marine Life Protection Program and the subsequent implementation of that program through the adoption and implementation of an associated master plan. (See generally Fish & G. Code, Sections 2853, 2855). The MLPA process is currently underway, separate and apart from the proposed project.

The MLPA provides that nothing in the act "restricts any existing authority of the department or the commission to make changes to improve the management or design of existing MPAs or *designate new MPAs* prior to the completion of the master plan." [*Id.*, Section 2861, subd. (c) (emphasis added)]. The MLPA, as a result, expressly authorizes and contemplates the designation of new MPAs prior to adoption of the master plan. The proposed project is entirely consistent with this provision of the MLPA. The MPAs contemplated by the proposed project are, in fact, independent of any actions the Commission and Department may take at some point in the future to adopt or implement the Marine Life Protection Program and the related master plan. Stated another way, the proposed project is neither a necessary precedent for the MLPA process nor does it commit the Department or Commission to adopt and implement a specific Marine Life Protection Program or master plan. The Draft ED does not violate CEQA's proscription against segmented environmental review for the same reasons.

The Department specifically disagrees that the scope of environmental analysis in the Draft ED violates "CEQA Guidelines" section 15165. (See Cal. Code Regs., tit. 14, Section 15165). As recently noted by the judiciary, the fact that this provision of the guidelines "refers to 'projects . . . to be undertaken' confirms that it is intended to apply only to project components that an agency is proposing to implement. It does not extend to preliminary plans, feasibility studies or contemplated development the agency is not proposing to approve or undertake." [*Berkeley Keep Jets Over the Bay Committee v. Board of Port Commissioners* (2001) 91 Cal.App.4th 1344, 1358, fn. 9 (internal citations omitted); see also *City of Vernon v. Board of Harbor Commissioners* (1998) 63 Cal.App.4th 677, 688]. The Department, in this regard, is not proposing that the Commission approve, undertake, adopt or implement a Marine Life Protection Program or a related master plan. CEQA Guidelines section 15165, as a result, does not apply.

Likewise, the Department disagrees that *Laurel Heights Improvement Assoc. v. Regents of the University of California* (1988) 47 Cal.3d 376, 393-399, compels analysis at this juncture of the environmental effects that may result from the future

implementation of the MLPA. In *Laurel Heights*, the California Supreme Court articulated a two-prong test to determine when environmental analysis under CEQA must take into account reasonably foreseeable future phases, or other reasonably foreseeable consequences, of a proposed project. Under the court's two-prong test, environmental analysis under CEQA must include analysis of the environmental effects of a future expansion or other action if (1) it is a reasonably foreseeable consequence of the initial project; and (2) the future expansion or action will likely change the scope or nature of the initial project or its environmental effects. (*Id.* at pp. 396). "Absent these two circumstances," the court emphasized, "the future expansion need not be considered in the [environmental analysis] for the proposed project." (*Ibid.*)

In contrast to the commenter's assertion, actions that the Commission and Department may take at some point in the future under the MLPA are not a "reasonably foreseeable consequence" of the proposed project. The Commission and Department have neither made decisions, nor formulated reasonably definite proposals as to any future actions under the MLPA regarding the Marine Life Protection Program or the related master plan. In fact, efforts by the Commission and Department to seek input from the public and interested agencies regarding potential future actions are just underway. This preliminary effort to garner public input and the prospect of action at some point in the future do not constitute an irreversible commitment by the Commission or Department to a particular course of action. In this respect, possible future actions under the MLPA are not "linked" to the proposed project. Indeed, as noted by the Supreme Court, "the mere fact that a lead agency acknowledges that it contemplates such a long-range goal [e.g., compliance with the MLPA] is not, by itself, sufficient to conclude that it is a 'reasonably foreseeable consequence of the initial project.'" (*Berkeley Keep Jets Over the Bay Committee, supra*, 91 Cal.App.4th at p. 1362, citing *Laurel Heights Improvement Assoc., supra*, 47 Cal.3d at p. 396). Accordingly, possible future actions under the MLPA are not a reasonably foreseeable consequence of the proposed project.

Comment 105: Due to lack of public participation and oversight in designing the DFG/CINMS preferred alternative, it is difficult to understand what specific goals have been achieved.

Response 105: The Department disagrees. See Response to Comment 48 regarding public participation. Attainment of project goals, of course, depends first upon project implementation.

Comment 106: The congestion resulting from displaced effort into areas immediately outside and adjacent to MPAs will result in an adverse environmental impact.

Response 106: The Department disagrees. See Response to Comment 5.

Comment 107: The Draft ED does not include the MLPA, cowcod, or shelf closures in a cumulative impacts analysis.

Response 107: The Marine Life Protection Act is specifically discussed in the description of project objectives found in Chapter 1. As noted in Response to Comments 54 and 104, the MLPA process is ongoing. The Cowcod Conservation Areas were addressed in the proposed project, including a recommendation to reopen a portion of the area. The Pacific Fisheries Management Council's recent shelf closures occurred as an emergency action after the publication of the Draft ED. The implications

of this action are discussed in Response 76. In the Department's view, the MLPA, Cowcod Conservation Areas, and shelf closures will not render the proposed project's incremental change to the existing physical conditions in and around the project area cumulatively considerable under CEQA. Moreover, the adaptive management component of the proposed project, as required by the Marine Life Protection Act, which includes ongoing monitoring, research and evaluation after project approval, will provide ongoing information regarding post-approval environmental conditions. This information, along with the Department's authority to recommend additional management measures to the Commission, will ensure that approval of the proposed project does not result in any significant cumulative impacts.

The commenter asserts that the cumulative impacts analysis in the Draft ED violates CEQA because of the purported failure to consider the MLPA, Cowcod Conservation Areas, and shelf closures. The Department disagrees. The Draft ED is a CEQA functional equivalent document prepared by the Department pursuant to the Commission's certified regulatory program in section 781.5 of Title 14 of the California Code of Regulations. (See generally *Mountain Lion Foundation v. Fish and Game Commission* (1997) 16 Cal.4th 105, 113-114.) In this respect, the Department acknowledges that the Draft ED must provide a meaningful assessment of whether the proposed project may result in significant cumulative impacts. (See, e.g., *Mountain Lion Coalition v. California Fish and Game Commission* (1989) 214 Cal.App.3d 1043, 1051.) It does provide the assessment, in the Department's view, and the commenter offers no substantial evidence to the contrary. That is, the commenter offers no substantial evidence that three allegedly foreseeable projects render the proposed project's less-than-significant impacts cumulatively considerable.

The commenter's cumulative impacts contention rests on the notion that the MLPA, Cowcod Conservation Areas, and shelf closures are "reasonably foreseeable" under existing case law and that these projects must be included in the cumulative impacts analysis pursuant to CEQA Guidelines section 15130. (See Cal. Code Regs., tit. 14, Section 15130.) The provision of the guidelines cited by the commenter, however, governs cumulative impact analyses in environmental impact reports, as opposed to environmental documents prepared pursuant to a certified regulatory program. Where an agency proceeds under CEQA by way of a certified regulatory program – such as the Commission in the present case – it need not prepare a cumulative impact analysis precisely as set forth in section 15130. Instead, an agency acting pursuant to a certified regulatory program must "consider" the prospect of significant project-related cumulative impacts where relevant, although it need not prepare an "analysis as such." (*Laupheimer v. State of California* (1988) 200 Cal.App.3d 440, 462, 466; see also "Discussion" following CEQA Guidelines, Section 15252.) In this respect, the Department believes that the Draft ED includes meaningful consideration and assessment of potential project-related cumulative impacts, and that the analysis is adequate under CEQA, particularly where substantial evidence supports the conclusion that the proposed project will not result in significant cumulative impacts. Please see Response to Comment 104 regarding alleged "piecemealing" and "segmented" environmental review in the Draft ED.

Comment 108: The document does not mention the current array of fisheries management measures and makes no mention of abundant stocks.

Response 108: The commenter contends the Draft ED "fails to mention" various issues and that the alleged failure renders the Department's consideration of the No Action

Alternative inadequate. The Department believes, in contrast, that the existing analysis in the Draft ED of the No Action Alternative fully complies with the Commission's certified regulatory program in section 781.5 of Title 14 in the California Code of Regulations, as well as the principles governing alternatives analysis under CEQA generally. The Department, in this regard, believes the Draft ED provides sufficient information to the Commission as the lead agency for the proposed project under CEQA. Please also see Response to Comment 109 for more information regarding analysis of the No Action Alternative in the Draft ED.

The Department disagrees that the alleged failure to "mention" certain information renders consideration of the No Action Alternative inadequate. The commenter contends that the Draft ED "fails to mention": (1) the benefits the Sanctuary offers to fishing; (2) the current array of fishery management measures that regulate fisheries in the project area; (3) an analysis of whether such measures "have failed," if at all; and (4) the "abundant [fish] stocks" that currently exist in and around the project area. While the Sanctuary itself has no direct prohibitions on fishing, the Draft ED, in contrast, describes the current status of both fisheries and species in detail in Chapter 4, Sections 4.3.3.3 through 4.4.1.2 at pages 4-42 through 4-146. These descriptions indicate that existing regulations are not adequately protecting some species, nor providing for long term sustainability. The existing ecological reserves at Anacapa, San Miguel, and Santa Barbara Islands are described on pages 3-1 and 3-2 of the Draft ED. These ecological reserves include two small invertebrate closures, a brown pelican fledgling area, and seasonal closures for the protection of marine mammals. Likewise, the Department added a table showing existing fisheries regulations to page 4-146 of the Final ED to facilitate understanding of existing regulations. Additional discussion of the efficacy of existing regulations is found in Response to Comment 20 regarding the No Action alternative. Finally, please also see Responses to Comments 4, 19, and 118 regarding the current status of marine resources, including fish stocks in and around the project area, and the basis for the Department's fishery management recommendations in the proposed project.

Comment 109: The Document fails to adequately consider the No-Action alternative (Alternative 7).

Response 109: The Department disagrees that the Draft ED fails to "adequately consider" the No Action Alternative. The commenter contends the Department's analysis of the No Action Alternative is inadequate because it fails to present "any convincing evidence that the current fishery management measures are inadequately protecting the resources in the project area." In so doing, the commenter questions the basis and need for the proposed project, asserting that there are "abundant stocks" ignored by the Department which render the proposed project unnecessary in the absence of more specific scientific information to the contrary.

At the outset, the Department disagrees with the commenter's assertion that discussion in the Draft ED of the No Action Alternative is limited to two paragraphs. Alternatives to the proposed project are introduced for the first time in Section 3.2 of the Draft ED, with the No Action Alternative described on page 3-16. Noting that the alternative "would continue the existing Marine Protected areas in the Sanctuary with no modifications[.]" the Draft ED refers the reader to Appendix 1, which sets forth a 58-page overview of current Marine Protected Area laws and regulations. This discussion provides an important framework for analysis of the No Action Alternative at pages 6-64 and 6-65 in the Draft ED. That analysis, in turn, is further informed by the 175-page overview of the

existing conditions and "environmental setting" provided in Chapter 4 of the Draft ED. This "baseline" discussion provides a comprehensive discussion of the existing physical and socioeconomic conditions in and around the area of the proposed project, and includes reference to empirical data relevant to the purpose and need for the proposed project. The Department, in this respect, disagrees with the commenter and respectfully refers the commenter to these sections of the Draft ED for additional information. Also, please see Response to Comment 20 for additional discussion of the No Action Alternative.

Finally, the Department disagrees with the assertion that the Department is recommending adoption of the proposed project based on an assumption "that resources in the project area are being unnaturally reduced due primarily to the impact of past human actions, and that these resources are likely to be further reduced with attendant losses of commercial and recreational opportunities." As noted in the MRWG problem statement (See Draft ED at p. 1-3), the proposed project addresses declines caused by a variety of factors, including human activities, climactic changes, and changes in predator populations. One of the goals of the proposed project is to help provide for sustainable resources, which would necessarily provide for more stable commercial and recreational opportunities.

Comment 110: The Draft ED does not propose adequate monitoring. It does not propose adequate pre-project monitoring and must include a detailed monitoring and enforcement plan.

Response 110: The Department disagrees that the proposed project fails to provide for adequate monitoring. See Response to Comment 17. The commenter suggests that specific Catch Per Unit Effort (CPUE) data must be collected in order to determine both MPA effectiveness and whether or not negative economic impacts have occurred. While CPUE data may be used in monitoring efforts, these data are often problematic when trying to determine population status. CPUE may remain high while total population declines due to a variety of other measures including outside management (e.g., Karpov et al. 2000). Conversely, fisheries independent monitoring, based on annual or more frequent measurements of populations, can provide indices of relative abundance. This is the case with the ongoing Channel Islands National Park Kelp Forest Monitoring program. As noted on page 5-30 of the Draft ED, the proposed project includes 7 of the 16 existing National Park Kelp Forest Monitoring sites that can be used as indicators of population trends. In addition, as part of the Department's Nearshore Fishery Monitoring both SCUBA and Remotely Operated Vehicle (ROV) surveys have been proposed. These surveys will provide ongoing population monitoring both within and outside MPAs. The ROV surveys will allow for monitoring of areas deeper than those within the depth range accessible to SCUBA divers. The MRWG also made recommendations on the monitoring, management, and enforcement of MPAs. These recommendations are included in Appendix 3 of the Draft ED. The SAC is currently using its public process to discuss potential monitoring programs, develop an MPA monitoring plan, and coordinate State and Federal enforcement agencies. The SAC will use existing MPA monitoring and enforcement, such as that occurring in Florida as examples. Both the CINMS and Channel Islands National Park contribute funding to help monitor resources and enforce regulations within the project area. This unique situation allows for additional patrol time and equipment in the area to help address enforcement concerns. The Department recently stationed a new 54' enforcement vessel in Ventura that will be dedicated to the region and a second in Dana

Point that can patrol the region. All of these factors will contribute to the successful implementation of the proposed project.

Comment 111: The Draft ED does not adequately propose mitigation for individual fisheries impacted by the proposed project particularly the red crab fishery.

Response 111: The commenter takes issue with the "lack of a mitigation proposal" in the Draft ED. The commenter deems the lack of proposed mitigation unacceptable, contending that the proposed project may result in "adverse impacts on fish populations in the remaining open areas." To support its argument, the commenter refers to the red crab fishery at San Miguel and Santa Rosa islands, noting that the proposed project contemplates a substantial closure of the fishery in and around these islands. In the commenter's view, ongoing capacity reduction through the Fishery Management Plan process will not reduce project-related adverse impacts on fish populations in remaining open areas to a less-than-significant level because the red crab fishery "is an open access fishery with no limitations on the number of permits issued."

The Department disagrees that the proposed project will result in significant adverse impacts on fish populations outside of the areas proposed for closure due to increased or "congested" fishing efforts. The basis for the Department's conclusion is detailed in the Draft ED at pages 5-17 through 5-18 and 5-31 through 5-32. In addition, please see Response to Comment 5 for additional explanation and analysis of this issue.

As for the red crab fishery and the proposed closures around San Miguel and Santa Rosa islands, the Department does not believe significant congestion-related impacts on fish populations will result. While the rock crab fishery is currently open access, with no restrictions on the number of permits issued, it is a relatively small scale fishery. Legislation (SB 2090) will become effective January 2003 that will give the Commission authority to regulate this fishery, including consideration of a restricted access program. According to Department landings data, an average of between 35 and 40 vessels land rock crab caught at the Channel Islands. These vessels focus primarily on the north side of Santa Rosa Island and the south side of San Miguel Island. The south side of San Miguel Island would have only a small amount of area closed, with little or no displacement of current fishing effort. According to the socioeconomic analysis, the primary areas fished on the north side of Santa Rosa Island are farther east than the proposed MPA. In addition, as discussed in Response to Comment 5, MPAs have not been shown to lead to congestion-related impacts in other areas. Because no significant project-related environmental effects are expected, no mitigation is required under CEQA. Moreover, the adaptive management component of the proposed project, as required by the Marine Life Protection Act, which includes ongoing monitoring, research and evaluation after project approval, will provide ongoing information regarding post-approval environmental conditions. This information, along with the Department's authority to recommend additional management measures to the Commission, will ensure that approval of the proposed project does not result in any significant environmental impacts.

The commenter suggests that a "complete and accurate" analysis of project-related impacts on fish populations "can only be developed by including spatial harvest information of the fishery participants in the project area." This type of information is exactly the type that was used in the socioeconomic analysis (Leeworthy and Wiley 2002). Fishing effort was described within 1 by 1 minute blocks of Latitude and Longitude. These spatially explicit data were then used to determine potential impacts

to various fisheries. Based on this information the Department feels that displaced effort from the rock crab fishery will not lead to negative environmental impacts. It is also important to note that economic impacts to fishery participants are not environmental impacts under CEQA. Moreover, the Department is unaware of any evidence that project-related economic impacts are indicative of significant adverse impacts on the environment or on fish populations. For additional information on potential socioeconomic impacts see Responses to Comments 5 and 12. Finally, for other additional relevant information, please see Response to Comment 72

Comment 112: The Draft ED makes numerous assumptions on reserve theory, which are not supported by substantial evidence in the record. The Science Advisory Panel concluded that large closures would be effective in the CINMS because large closures were effective elsewhere.

Response 112: The Department disagrees that the Draft ED rests on unsupported assumptions. The SAP recommendation to include between 30 and 50% of all habitats was based on the review of published scientific articles. Among those articles were studies of large fisheries management closures, as well as small and large Marine Protected Areas (e.g., Roberts et al. 2001; Stevens and Sulak 2002; Murawski et al. 2000; McClanahan and Kaunda-Arara 1996; Ratikin and Kramer 1996; and Russ and Alcala 1996b). The SAP's conclusions were directed at meeting only two goals, ecosystem biodiversity and sustainable fisheries. The conclusions were based on both empirical evidence and theory found in the bulk of the articles. The SAP's conclusions were not based, as the commenter suggests, on the fact that "since large closures are effective...off the George's banks, large closures should be the primary tool for managing 119 species at CINMS." A discussion of how the SAP reached this conclusion is found on pages 5-6 through 5-17 of the Draft ED. The Department's recommendation concerning the proposed project, while using the SAP recommendation as a guide, differs with respect to the percentage included. In integrating other goals and objectives, such as economic and social concerns, the Department chose a smaller percentage set aside. The Department also determined MPAs would be integrated with other management measures in order to best meet all the project goals. See also Response to Comment 16.

Comment 113: The Department is using a percentage based approach to determine reserve size.

Response 113: The Department disagrees. See Response to Comment 97.

Comment 114: The Science Advisory Panel used habitat as a proxy for species distribution; this resulted in hidden environmental and economic impacts due to the actual distribution and concentration of species being much more compressed than assumed.

Response 114: The Department disagrees that use of habitat as a proxy for distribution translates into actual physical impacts. Indeed, the establishment of MPAs within the project area is not expected to result in any significant adverse impacts. This expectation would not change based on the relative concentration of species. If a species concentration was more "compressed" within a habitat, it would receive even more protection within an MPA. As long as the network of MPAs includes a portion of an individual species habitat, as suggested by the SAP, an equivalent portion of the population will be included in MPAs. Two types of species would be expected to show a

compressed concentration; benthic species that are relatively sedentary, and benthopelagic species (species in the water column that are associated with bottom habitats) with little adult movement or schooling behavior. As noted in Parish (1999), benthic species “are good candidates for achieving near virgin biomass levels in reserves but not likely candidates for improvement of fishery yields....” The second part of this statement is not always true. The George’s bank scallop experience is a good example of a benthic species with improved fishery yields outside an MPA (Murawski et al. 2000). Parish (1999) also notes that benthopelagic species “are the most likely candidates for primary management by marine reserves....” Based on the published literature it is expected that species with compressed distributions would actually receive more benefits from MPAs, not negative impacts. In its review of the SAP proposal, the Pacific Fisheries Management Council Science and Statistics Committee (SSC 2001) specifically stated, “...the Science Panel operated under the premise that the inclusion of habitats in proportion to their occurrence...could be expected to provide broad ecosystem protections.... The SSC considers the Panel’s approach to addressing the biodiversity goal to be reasonable....” The estimates of potential economic impact are based on the actual distribution of ex-vessel value, not the distribution of habitats. The distribution of value is based on direct input from the user groups. The proposed project is based on a combination of both the potential economic impacts and potential environmental benefits. See also Response to Comment 16.

Comment 115: The Science Advisory Panel concluded that three separate biogeographic regions are contained within the project area. None of the 119 species emanates from or exhibits characteristics unique to the transition region. By substituting biogeographic region for species range, the number of MPAs is unnecessarily increased.

Response 115: The Department disagrees that the use of biogeographic regions in describing the project area unnecessarily increased the number of MPAs. As noted in Table 5-2 on page 5-16 of the Draft ED, seven ecological criteria can be used to determine the number and size of MPAs in a network. This includes representing critical habitats, including areas inhabited by species of concern and at critical life history stages, including vulnerable habitats, as well as replicating reserves within the bioregions. This replication is based on total area and the desire to represent a percentage of the habitats within that area. Therefore, if a single bioregion was used as opposed to three, the total number of reserves within that bioregion would be greater due to its greater total area and need to represent a greater variety of habitats. In addition, the total number and spread of reserves was influenced by other factors, including providing insurance that a single catastrophic event would not impact all reserves at the same time. By definition, a transition zone contains representative species of both of the biogeographic regions it separates. The fact that the species found in the transition zone show characteristics of either the warmer Californian biogeographic region or the colder Oregonian biogeographic region indicates that a transition area exists.

Comment 116: The Science Advisory Panel incorrectly concluded that 119 species were in need of and would receive additional protection from MPAs. 57 of these species are fully protected and of the remaining 62 only 33 are not shelf or nearshore rockfish.

Response 116: The SAP made no such conclusion. The “Species of Interest” includes species that meet one or more of the following criteria: 1) species of economic and/or

recreational importance, 2) keystone or dominant species, 3) candidate, proposed, or listed species under the Endangered Species Act, 4) species which have exhibited long-term declines in harvest and/or size frequencies, 5) habitat forming species, 6) indicator or sensitive species, or 7) important prey species. This list was developed jointly by the MRWG, Department and Sanctuary staff, and the SAP. The MRWG agreed to the final list in public meetings. Fully Protected is a legal term that prohibits all take and applies to very few of the species (permits are not authorized). Of the 119 species identified, regulations prohibit take of 22 without special permits. These include: 2 surfgrass species, eelgrass, 5 abalone species, cowcod rockfish, bocaccio rockfish, canary rockfish, yelloweye rockfish, giant seabass, broomtail grouper, garibaldi, tidewater goby, California brown pelican, snowy plover, California least tern, harbor seal, northern fur seal, and southern sea otter. The remaining 97 species, including shelf and nearshore rockfishes, have various levels of protection but all allow some take (Draft ED Chapter 4). Also, the commenter apparently implies that a protected status in law equates to actual protection in the environment, and so the proposed project is unnecessary or duplicative. However, such existing legal protections are neither self-enforcing, nor are they adequate to provide the level of protection sought by the proposed project.

Comment 117: The Science Advisory Panel assumed that fishery management at the CINMS is poor or nonexistent.

Response 117: The Department disagrees with this statement. The SAP specifically stated it “recommend[ed] maintaining the current fishing effort (or enforcing sustainable levels of fishing) outside marine reserves” (SAP recommendation included in Department Recommendation to Fish and Game Commission, Volume 5, 2001). This statement implies that existing fisheries management is at or near sustainable levels and should continue as such. The SAP recognized the importance of existing fishery management in their recommendation. The SAP specifically recommended that existing fishery management be maintained outside MPAs in order to prevent overfishing. Although the SAP recognized that existing management is not sustaining all species in the region, it did not state that management was poor to nonexistent.

Comment 118: The generally accepted range of percentage for reserve size is as follows: a) monitoring reserves 1-10%, b) Added precaution in fishery management 10-20%, c) Alternative fishery management and stock rebuilding 20-50%. In light of groundfish closures, stock rebuilding appears unnecessary and redundant.

Response 118: The Department disagrees. The groundfish closures are directed at rebuilding specific species of groundfish, not at a wide range of other species. In addition, these closures are based on annual assessments and could be removed if assessments change. Within the project area several other species show declining population trends and would likely benefit from additional protection. Though not formally designated as overfished and in need of stock rebuilding, declining population trends indicate a need for added precaution. In the nearshore finfish complex declines have been noted in brown rockfish, copper rockfish, olive rockfish, cabezon, surfperches, and others. Many finfish species abundances are unassessed and unknown. Abalone in general, and white abalone in particular, are at extremely low levels. There is a wide range of scientific guidelines on what percentage area is appropriate for a given goal. This comment seems to be referring to Parrish (1999), which uses the described range in its introduction. The goals listed in this comment are related to fisheries management, and they fit within the generally accepted range. Other goals, such as natural heritage, ecosystem biodiversity, and ecological function

result in different ranges. The proposed project would encompass 19% of State waters and thus falls within Parrish's (1999) range of a precautionary approach not stock rebuilding or alternative management. The proposed project also addresses ecological goals that do not relate directly to stock rebuilding or fisheries management. Finally, the proposed project does not attempt to achieve a particular percentage goal, but instead focuses on adequate representation of habitats within bioregions. See also Responses to Comments 79 and 97.

Comment 119: The Draft ED fails to consider an alternative that meets the requirements of the MLPA with representative habitat as the objective.

Response 119: The Department disagrees. The commenter asserts that the Sanctuary Advisory Council forced the SAP and MRWG to consider only complete no-take reserves. While the MRWG chose to consider only no-take reserves, the proposed project includes State Marine Conservation Areas, which allow limited take. The commenter asserts that the SAP was instructed to assume that fishery management in the project area had failed. No such instruction was given and, as noted in Response 117, the SAP did not make this assumption in their recommendation. The commenter asserts that the SAP assumed that the project area and all its biotic organisms were isolated at the CINMS. While the SAP focused their discussion on the Sanctuary area, this did not exclude discussions of how the project area was impacted by outside forces. In particular, the oceanic current patterns of the entire Santa Barbara Channel were discussed in order to determine potential for export from MPAs. Finally the commenter asserts that reserve designers were forced to design reserves for 119 species of concern that were selected in an arbitrary method. The Department disagrees with this contention. The species-of-interest list was developed based on a set of seven distinct criteria (See Response 116) not by an arbitrary method. In addition, due to the lack of knowledge regarding the range and distribution of many of these 119 species, a habitat based approach to reserve design was used rather than a species distribution approach. The proposed project represents and replicates a wide range of habitats within the project area, as noted in Chapter 5 of the Draft ED. Each alternative represents varying amounts of habitat including higher and lower levels of representation. The goals of the proposed project include not only the MLPA goal to represent habitat, but also the other goals of the act. These goals are not ranked in the MLPA and are seen as an overall framework for the State's MPAs. They include: protection of natural diversity and abundance; helping to sustain conserve and protect marine life; improvement of recreational, educational and study opportunities in areas subject to minimal human disturbance; and protection of marine natural heritage, including representative habitats. Taken together, the Department disagrees with the suggestion that the Draft ED fails to include a "full range of alternatives." The Draft ED, in fact, includes a reasonable range of alternatives to the proposed project that facilitate meaningful environmental review, as well as fostering informed decisionmaking and public participation. In this respect, the alternatives addressed in the Draft ED comply with the obligations in section 781.5 of Title 14 of the California Code of Regulations, as well as the "rule of reason" governing required analysis of alternatives under CEQA generally. See also Response to Comments 97 and 79.

Comment 120: Expresses general support for Alternative 6 (defer decision).

Response 120: See Response to Comment 20.

Comment 121: Expresses general support for the proposed project.

Response 121: Comment noted.

Comment 122: The final document should acknowledge new management measures for rockfish that have occurred or may occur.

Response 122: See Response to Comment 76.

Comment 123: The proposal to reopen a portion of the Cowcod Conservation Area may no longer be consistent with rockfish management.

Response 123: The Department agrees. The proposal to reopen a portion of the Cowcod Conservation Areas was included to provide recreational fishing opportunities on the continental shelf by replacing a portion of those opportunities lost through the proposed project. Given that the shelf is now closed to fishing activities that may impact groundfish, changing the Cowcod Conservation Areas may be inconsistent with Federal regulations. The Department, as a result, intends to recommend to the Commission that it not adopt this portion of the proposed project. There are no changes to the potential environmental impacts associated with this recommendation and the Department believes this change will not result in any significant environmental impacts.

Comment 124: Another resource management concern is the lack of protection of seabirds in critical breeding and roosting areas.

Response 124: While seabirds may receive some added protection through the placement of MPAs, this protection is not the primary purpose of MPAs. Many seabirds are affected by disturbance caused by human activities. Since the proposed project does not exclude access to MPAs, the overall level of activity would only be reduced by the number of vessels that no longer access an area for fishing. Non-consumptive uses, transit, and anchoring are not prohibited. The Department believes that seabird breeding and roosting area protection is better handled through other management strategies. Even so, the Department believes that approval and implementation of the proposed project will not cause any potentially significant impacts on the species or the habitat identified by the commenter. In fact, the Department believes such species will actually benefit from the additional protection afforded by the proposed project. Finally, the Department welcomes NOAA's commitment to joint agency efforts to address "potential human threats in these areas and [to] develop strategies to protect seabirds." See also Responses to Comment 16 (regarding adaptive management) and Comment 17.

Comment 125: The final document should discuss existing and/or planned biological and economic monitoring and plans for enforcement.

Response 125: See Responses to Comment 110 (regarding biological monitoring) and Comment 17 (regarding MOUs).

Comment 126: The final document should include more detailed discussion of how MPAs will be integrated into fisheries management.

Response 126: The Department disagrees. The role of MPAs in fisheries management is more appropriately addressed through the fisheries management process of the MLMA. See also Response to Comment 4.

Comment 127: The Project is inappropriately segmented in the analysis. It does not give adequate attention to the impacts of the MLPA.

Response 127: The Department disagrees. See Response to Comments 104 and 107.

Comment 128: The proposed project should be implemented as a pilot or test case.

Response 128: The Department agrees. The Draft ED notes on page E-3 that “a timely decision will provide needed insight and experience in the implementation of reserves before the MLPA suggest MPAs for the entire State.” Given the present timeline for the MLPA public process, Channel Islands MPAs can function as a test case for both implementation and monitoring.

Comment 129: The document does not reference any scientific papers that deal with the problems of congestion of fishing effort or zonal management. There are no resources cited in support of social geography, cartography, anthropology, community-based management, societal and ethical values, etc.

Response 129: The Department disagrees. The Draft ED references papers dealing with potential problems of MPAs on pages 1-14 through 1-17. It also discusses the potential for congestion of fishing effort and the reasons why this potential congestion is not expected to lead to significant adverse environmental impacts at pages 5-17 through 5-18. Environmental ethics and potential benefits to communities are discussed on pages 1-11 through 1-14. As to other non-CEQA issues, the Department welcomes any and all input regarding policy issues that serve to foster informed decisionmaking and the sound exercise of policy discretion by the Commission.

Comment 130: The document fails to analyze CalCOFI larval survey data to explain source and sink populations.

Response 130: The Department disagrees that the referenced survey can be used to identify sources and sinks. A source population is a population in which the birth rate exceeds the death rate, and the young survive to grow and reproduce at their birthplace and other places in the region. A source population supports other populations in the region that are not as productive. A sink population is a population in which the death rate exceeds the birth rate, and the persistence of the sink population depends on recruitment from source populations elsewhere.

Various types of data, including the size of the adult population, the average production per adult, the rates of survivorship (or mortality) of young and adults, and the potential for dispersal of young and adults, are needed to identify sources and sinks. In addition, these demographic rates exhibit temporal variation. Over time, source populations may become sink populations and vice versa.

The CalCOFI database includes 66 stations off Southern California. Only one of these stations is within the Sanctuary boundary and four surround the project area to the north and south. The data provided by CalCOFI surveys are useful to estimate the relative abundance of various species throughout Southern California, as well as some of the factors that may influence the distributions of species. However, the data cannot be used to identify sources and sinks.

Comment 131: The document inadequately discusses the ecological science framework and tradeoffs of designing marine reserves to protect species at the edge of their ranges.

Response 131: The Department disagrees. The ecological science framework and tradeoffs describe in the Draft ED would not differ for species at the edge of their range. Reserves have localized, as well as regional, effects. In general, the abundance of organisms increases in marine reserves relative to fished waters, even if those species are at the edges of their ranges. For example, both California spiny lobster (*Panulirus interruptus*) and California sheephead (*Semicossyphus pulcher*) are at the northern end of their common range in the Channel Islands. In both cases there is evidence that a small no take reserve at Anacapa Island provides local benefits to these species. Lobster are six times more abundant and larger than those in surrounding waters and sheephead are three times more abundant (M. Behrens and K. Lafferty, analysis of NPS data).

The effects of reserves on species at the edges of their ranges also depend on the direction of prevalent currents in the region. Reserves may contribute to regional production if prevalent currents travel from the edge of the species' distribution, through the reserve, and toward the center of the species' distribution. Currents in the Santa Barbara Channel are known to form a cyclonic eddy traveling west along the mainland and east along the north side of the islands. The locations of reserves in the proposed project were influenced by local production, as well as their potential contributions to the region based on the patterns of circulation. Reserves may not contribute much to regional production if currents move through the reserve and away from the center of the species' distribution. At certain times of the year, currents may flow out of the Santa Barbara Channel to the west. During this period, reserves located around the western islands may not contribute to regional production. See also Response to Comment 16.

Comment 132: The Document does not provide detail on long term monitoring plans.

Response 132: See Response to Comment 110.

Comment 133: The document ignores the NRC Report's findings that quality habitat should be set aside as opposed to a pre-determined percentage goal.

Response 133: The Department disagrees with this statement. The NRC, in their report Marine Protected Areas: Tools for Sustaining Ocean Ecosystems addresses critical and vulnerable habitats, not "quality habitat". See Response to Comment 97.

Comment 134: The Proactive Fishermen's Plan (Alternative 2) selects the best quality areas for no-take MPAs as a phase 1 pilot project. The plan is based on the idea that effective enforcement along with careful monitoring and evaluation will inform phase 2 for the purposes of adaptive management.

Response 134: Though the measurement of habitat quality is subjective, the Department generally agrees with this approach. As noted in Response 79, the proposed project represents and replicates a wide range of habitats within the project area (see Draft ED Chapter 5). Each alternative represents varying amounts of habitat including higher and lower levels of representation. The goals of the proposed project include not only the MLPA goal to represent habitat, but also the other goals of the act. These goals are not ranked in the MLPA and are seen as an overall framework for the

State's MPAs. They include: protection of natural diversity and abundance; helping to sustain conserve and protect marine life; improvement of recreational, educational and study opportunities in areas subject to minimal human disturbance; and protection of marine natural heritage, including representative habitats. Further, many of the same or substantively the same habitats and locations are included in both the proposed project and Alternative 2. Overall, the proposed project overlaps Alternative 2 by 78 percent. This is especially true in nearshore areas. In addition, the proposed project includes habitats around Santa Barbara Island that are not included in Alternative 2. One way of determining the relative value of an individual area is to consider the number of habitats within that single area (habitat heterogeneity). Figure 8-1 depicts the overlap of the proposed project and areas of highest habitat heterogeneity. These areas include breeding sites, marine mammal haul outs, rare habitats, and critical habitats for various species of interest. In light of these considerations, Alternative 2 does not achieve project goals and objectives to the same extent as the proposed project. In contrast to the comment, phasing is not specifically prohibited by the proposed project. The Fish and Game Commission may, in fact, exercise its discretion and decide to implement portions of the plan prior to others. A detailed description of potential phasing is provided in Attachment 8 to the Initial Statement of Reasons for Regulatory Action for the proposed project. See also Response to Comment 15 for a discussion of phasing. A review of this description has been added to section 3.2.2 of the Final ED.

Comment 135: The document should analyze whether existing fisheries management is adequate to protect the species of interest.

Response 135: The Draft ED analyzes the adequacy of existing fisheries management. Chapter 4 of the Draft ED lists the status of species in the project area. In many cases these species are in a state of decline. For the species of interest, four finfish are considered overfished by the Pacific Fishery Management Council and many other finfish populations have not been formally assessed but are considered to be in downward population trends. White abalone, in turn, is listed as an endangered species and black abalone is proposed for listing. Based on the above facts, it is clear that traditional management alone has not been sufficient to protect some groundfish and other populations. One goal of MPAs is to provide insurance for management uncertainty by providing areas where species can interact in a relatively undisturbed ecosystem. Finally, the Department rejects the implied notion that MPAs should not be used as a marine resources or fisheries management tool absent extensive scientific study indicating that all other management tools are failing or ineffective. The Department appreciates and understands opposing view points on this issue, however, and comments to this affect are part of the administrative record of proceedings that will be presented to the Commission for its consideration prior to any final action regarding the proposed project. See also Responses to Comment 4 and Comment 16.

Comment 136: The species of concern list was not a consensus product of the MRWG and was developed by the Sanctuary and Department.

Response 136: The Department disagrees. The "Species of Interest" list was developed jointly by the MRWG, Department and Sanctuary staff, and the SAP. The final list was agreed to by the MRWG in public meetings.

Comment 137: What negative impacts on fishery stocks, habitat, and harvest are a consequence of squeezing the same number of fishermen into (for the preferred alternative) 75% of the fishing space?

Response 137: The Department does not feel that approval of the proposed project will lead to significant adverse impacts on stocks, habitat, or harvest due to congestion. In addition, the adaptive management component of the proposed project, as required by the Marine Life Protection Act, which includes ongoing monitoring, research and evaluation after project approval, will provide ongoing information regarding post-approval environmental conditions. This information, along with the Department's authority to recommend additional management measures to the Commission, will ensure that approval of the proposed project does not result in any significant environmental impacts.

The commenter specifically cites two papers as evidence of potential negative impacts on harvest (Anderson 2000; Parrish 1999). Anderson (2000) is not a peer reviewed study. It combines the use of economic revenue curves and biological models. The paper ignores the fact that reproductive potential within reserves increases dramatically. In addition it ignores the fact that other fisheries management, including reductions in fleet capacity and Total Allowable Catch will also address potential impacts to sustainable harvest levels. The structure of the model guarantees that any situation including reserves will necessarily have lower fishing yields than a system without reserves. The problem is that the model of population growth is essentially a logistic growth model where there is no production of new fish once the population is at carrying capacity. Since all reserves reach carrying capacity quickly in the absence of fishing, they contribute nothing to population growth in the model. Quite the contrary, there is widespread evidence that the larger individuals commonly found within reserves have substantially higher fecundity than smaller adults outside. If this component is excluded from consideration, the model has little relevance to reserve design.

In the second model of this paper, adults are allowed to move out of the reserve. This provides a mechanism for increased abundances in the reserve to benefit fishing beyond the reserve boundary. The model shows the obvious result that as the rate of adult movement increases, the optimal fishing yield converges on the no reserve fisheries case. This convergence is simply because if adults move rapidly and freely beyond reserve boundaries, closing a given area to fishing is identical to reducing overall fishing mortality until it protects an equivalent fraction of the population. Again, this result is already well known. In the highly mobile situation, controlling the number of fish caught using space or effort restrictions become equivalent as Hastings and Botsford (1999) have already demonstrated in a much more general form.

Parrish (1999) discusses potential impacts of reserves used as an "alternative strategy for sustainable development" in the range of 20-50% of area set aside and particularly reserves at or above 35%. Parrish (1999) also states that reserves in the range of 5%-20% used "as a buffer or insurance against overfishing" are "beyond the simple analyses presented here" and not addressed. The proposed project falls into the high end of this range at 19% of State waters. Even so, the perceived potential for negative impacts can be addressed. The discussion above indicates that simple models may not adequately include changes in fecundity that will lead to fisheries benefits outside MPAs, particularly for species that have shorter adult dispersal distances. See also Response to Comment 5.

Comment 138: The document does not consider the impacts of individual areas on displacement of the lobster fishery particularly on the North side of Anacapa Island and the Northeast side of Santa Cruz Island.

Response 138: The Department does not feel the proposed MPAs would have a significant socioeconomic impact on the lobster fishery or lead to a negative impact to lobster fishing habitat. The maximum potential loss estimated for these two areas is less than 1% of existing catch, based on analyses of landings figures and location data provided by lobster fishermen (Leeworthy and Wiley 2002). This is primarily due to the fact that lobster fishing is already limited by the existing Anacapa Island Ecological Reserve Natural Area on the northeast side of Anacapa Island and the fact that lobster trapping would be allowed in the proposed Anacapa Island State Marine Conservation Area on the northwest side of the island. Habitat for lobster trapping would also remain available at the extreme northeast end of Santa Cruz Island and in the more protected waters to the west of the proposed Scorpion State Marine Reserve. Department landing data show that lobster catch is distributed through all Fish and Game Blocks around the northern Channel Islands. See also Response to Comment 5.

Comment 139: The proposed project disproportionately impacts the red crab fishery.

Response 139: See Response to Comments 72 and 5.

Comment 140: The proposed project closes a significant portion of the kelp beds, thus disproportionately impacting sea urchin fishermen and not meeting its objectives.

Response 140: The Department disagrees. Project-related economic and social effects are not environmental impacts per se for purposes of CEQA. The proposed project includes 21% of available kelp forest habitat. The overall maximum potential economic impact to the sea urchin fishery is estimated at about 16%. This maximum potential economic impact is based on the assumption that any revenue currently generated in areas proposed for MPAs will not be replaced by redirected effort in other areas. It ignores fishermen's abilities to change fishing locations in order to compensate for the regulatory change. In balancing the objectives to minimize economic impacts (shown by a 16% potential economic impact with a 21% area closure) and to promote ecosystem biodiversity, the proposed project necessarily has higher economic impacts to certain types of fishing. Thus the proposed project more completely meets the range of goals and objectives as a whole, rather than a subset of them.

Comment 141: The proposed project would restrict white seabass and halibut fishing by an additional 25% without mitigation.

Response 141: The comment assumes that the entire area within MPAs of the both the State and Federal phase is currently used by these fisheries. The estimated maximum potential loss in income to flatfish fishing as a whole is about 12%; halibut is a subset of this group. The estimated maximum potential loss in income to sculpin and bass fishing is about 11%; white seabass is a subset of this group. It is inappropriate to sum these economic impacts in order to come up with an economic impact to the two fisheries combined. A specific adjustment to the working draft of the proposed project was made to help reduce economic impacts to the drift net fisheries by moving the boundary of the proposed Carrington Point Marine Reserve closer to shore. See also Response to Comment 5 regarding mitigation for socioeconomic impacts.

Comment 142: The document does not discuss the prospect of increased foreign competition for market share and potential cumulative impacts to marine resources as a

result of "accelerating competition and transfer of effort to another region of the same ecosystem, the California Bight in Mexican waters."

Response 142: Increased competition for market share is usually discussed in reference to a time period when local production is significantly reduced or prohibited so that it does not meet demand. This is true for fisheries completely closed during specific time periods. The intent of the proposed project and MPAs generally is to provide for continued sustainable use. In this respect, the Department believes the proposed project will facilitate and maintain the ability to provide local production. Stated another way, the Department does not believe the proposed project will "preclude local fisherman from competing in the now-undercut wholesale prices of heavily overexploited fish stocks in the Sea of Cortez and Baja's Pacific Coast in California markets." See also Responses to Comments 5 and 12 regarding mitigation for socioeconomic impacts.

As to the comment regarding cumulative impacts, the Department disagrees that the proposed project will result in the transfer of fishing effort internationally such that significant, project-related cumulative impacts in Mexican waters occur. As detailed in Response 5, the Department believes that the proposed project will not result in direct or reasonably foreseeable indirect significant impacts on fish populations outside of the areas covered by the proposed project. For the same reason, even though the Department acknowledges the adverse condition of certain fisheries in Mexican waters, we disagree that the proposed project will cause an adverse, cumulatively significant incremental contribution to the existing condition of the Mexican and/or international fishery.

Comment 143: The Draft ED fails to provide "management context" under CEQA for Project Alternatives, which "masks" significant environmental impacts.

Response 143: The Department disagrees that "management context" for alternatives to the proposed project are required under CEQA and that the alleged failure to do so "masks" project-related environmental impacts. The Commission's certified regulatory program governing preparation of the Draft ED requires the Department to include reasonable alternatives to any recommendation made to the Commission [Cal. Code Regs., tit. 14, 781.5, subd. (a)(2)]. In the present case, the proposed project is the Department's recommendation to the Commission. The Draft ED, in turn, in Chapter 6, addresses and describes seven alternatives to the proposed project. In the Department's opinion, the alternatives presented fulfill the obligation under CEQA to provide a reasonable range of project alternatives sufficient to foster informed decisionmaking and public participation. The commenter does not appear to contend that the range of alternatives considered in the Draft ED fails to pass muster under the rule of reason.

The commenter asserts that "management context" is required for an appropriate assessment of project- and alternative-related environmental impacts. The Department agrees that fishery management considerations are relevant to the Commission's exercise of discretion with respect to the Department's recommendation and alternatives to the proposed project. CEQA, however, requires the Draft ED to assess project-related environmental impacts, as well as the comparative impacts of the various alternatives, based on the existing physical conditions in and around the project area at the time the Department commenced review of the proposed project under CEQA (See generally Cal. Code Regs., tit. 14, Section 15125). The Draft ED complies

with this requirement. The Department, as a result, disagrees that the alternatives discussion in the Draft ED is inadequate under CEQA absent a more detailed overview of "management context." The Department, for the same reason, also disagrees with the statement that the existing alternatives analysis "masks" significant project-related environmental impacts. The commenter, in turn, in offering an opinion, presents no substantial evidence that the proposed project or the alternatives will result in currently unidentified significant environmental impacts.

Finally, the commenter also contends that: (1) the "methodology of the supporting science" in the Draft ED is "flawed" and "fails to meet project objectives"; (2) the Draft ED "omits essential fishery information necessary for evaluating these objectives"; and (3) the Draft ED "fails to provide adequate scope to its range of alternatives for consistency with the MLMA [and] MLPA." The commenter, however, offers these comments without any supporting analysis, cross-references to the Draft ED, or any substantial evidence. The Department disagrees with the commenter for this reason, noting that the Draft ED provides a detailed description of the proposed project, analysis of whether the proposed project will result in significant environmental impacts, and an overview and comparative analysis of a reasonable range of project alternatives. The Department notes, however, that all public and agency comments will be presented to the Commission for its consideration prior to taking any final action on the proposed project. For additional information regarding the proposed project, and existing and emerging management practices, please see Response to Comment 108.

Comment 144: The Draft ED fails to support the strategic implications of placing the highest density of fishery closures on the west coast in the CINMS based on biological criteria or sustaining yield. The final document should discuss what biological performance standards will be used to measure performance.

Response 144: The Department disagrees with the statement that the Draft ED fails to support its conclusions based on biological criteria or sustaining yield. The biological criteria used to develop the proposed project are described in detail in Section 5.3.1 on pages 5-6 through 5-18 of the Draft ED. Pages 5-7 through 5-9 in this section address specifically the implications of reserves for fisheries (i.e., sustaining yield). If the discussion of MPAs is broadened to the more general category of "fishery closures" the proposed project is significantly smaller than several other closures. These would include the Cowcod Conservation Areas and the recent fishery closures on the continental shelf, both of which cover huge amounts of area and 100% of various habitats, an obviously more dense concentration. Overall MPA performance will generally be judged based on how well the proposed project meets its defined goals and whether the expected ecological benefits occur. The specific standards for measuring performance would vary depending on the final choices for whatever alternative network is implemented. See also Response to Comment 17.

Comment 145: The proposed project does not consider the relative scale of reserve size compared to island size and use patterns.

Response 145: The Department disagrees. The relative size of individual MPAs within the proposed project is indicative of the habitat-based approach used to develop the proposal, as well as the multiple goals and objectives. The fact that a higher density of reserves is found at each end of the island chain is supported by the distribution of critical habitats (see Figure 8-1). The proposed project attempted to include the most heterogeneous habitat regions in order to reduce the overall area. Each MPA is

intended to function in conjunction with the network as a whole and is sized and located based on an effort to reduce potential economic impacts while still including important habitats and maximizing ecological benefits. See also Response to Comment 79.

Comment 146: A better way to assess a reserve's representation of habitats is to use relative heterogeneity of ecological features. The document fails to consider the relative heterogeneity of ecological features within reserves.

Response 146: The Department agrees with the approach of looking at relative heterogeneity of habitats, but disagrees that the document fails to consider this. Part of the scientific basis for selecting core reserve areas was focused on areas that included the maximum number of habitats within the smallest total area (heterogeneity). The development process included a scientific model that encouraged using the most heterogeneous areas to reduce the total area required. The summed results of the model are shown in Figure 8-1 and are overlaid with the boundaries of the proposed project. This figure demonstrates that the proposed project includes some of the most heterogeneous habitats. It also shows how certain highly heterogeneous areas were excluded based on other criteria such as reducing economic impacts. See also Response to Comment 79.

Comment 147: A variety of options for phasing are provided and should be presented in the final document.

Response 147: See Response to Comment 15. For clarity, the phasing alternatives as discussed in the Initial Statement of Reasons have been added to the description of Alternative 2 in the Final ED (Section 3.2.2, pages 3-13 through 3-14). The commenter also provides additional information on phasing alternatives. This information can be found in the reproduction of the comment (L-13-22) in Section 8.3 below. According to the comment, "integration-focused" phasing would not occur until "[r]estricted access, capacity goals, and regional data management program(s)" existed and "essential fisheries information baseline (is) programmed and in place." The Department feels that these types of standards would be too restrictive and not allow for adaptive management based on potential benefits or changes to population status. According to the comment, "time sequential phasing" would not occur without baseline monitoring and fisheries impact monitoring. The comment states that, in "time sequential phasing," the second phase would occur ten years after the first, or two reserves would be phased in every five years. The Department agrees that timed based phasing could potentially lessen short term economic impacts and might allow for research on the first phase. The Department feels that the actual length of time between phases should not be based on performance criteria or life history parameters that may not be known or understood. The comment states that "sunset clause" phasing would be tied to "rigorous accountability." Most of this option is based on removing reserves if certain budget parameters are not met. The Department believes that although MPAs should not be implemented without appropriate funding, the specifics of such an option are impractical given the State budget process. In addition certain recommendations within the comment (e.g., establishing commissions) are beyond the authority of the Commission. The comment lists three options for "economic impact" phasing. The Department feels that each of these options ignores the potential economic impacts of the status quo and the potential economic benefits of the proposed project as discussed in Section 6.8.2 on pages 6-68 through 6-74 of the Draft ED. Finally the comment states that "natural history and peoples eco-park" phasing would occur based on the ability of the public to access the areas and the existing abilities for monitoring and

enforcement. The Department disagrees with this option because it addresses only one of the goals of the proposed project: to allow for recreational activities in areas minimally disturbed by human impacts. It does not address the goals of ecosystem biodiversity or sustainable fisheries and it could lead to negative economic impacts due to continuation of current population trends or lack of potential MPA benefits to fisheries.

Comment 148: Expresses general support for the proposed project.

Response 148: Comment noted.

Comment 149: The document is legally sufficient under CEQA.

Response 149: The Department agrees.

Comment 150: The document does not sufficiently describe the potential impacts of alternative 6 (defer) and 7 (no action).

Response 150: See Response to Comment 20.

Comment 151: A more thorough treatment of the environmental effects of the project is desirable.

Response 151: The Department believes that the treatment of environmental effects of the project is adequate. The proposed project is based on a concept of ecosystem management and is intended to provide ecological benefits. The potential benefits and costs of the proposed project are described in detail in Chapter 5. Information on the potential impacts of no action or deferring to the MLPA process is discussed in the Response to Comment 20.

Comment 152: The executive summary should more extensively analyze each alternative with respect to the ecological criteria in Section 5.3.1.

Response 152: Additional language has been added to the executive summary to reflect changes in the analysis of alternatives. These changes reflect the potential impacts to the environment for the no action alternative that have been added to chapter 6 and are described in the Response to Comment 20.

Comment 153: More detail should be provided in section 6.6 on how deferring to the MLPA will not meet the goals or objectives of the proposed project.

Response 153: Detail has been added to the Chapter 6 and the executive summary on how the goals of the project are not met, and there is a potential for long-term negative impacts of both the no action and defer to MLPA alternatives.

Comment 154: Taking no action and deferring to the MLPA are substantively the same and should be combined as a single alternative.

Response 154: The Department disagrees. While taking no action and deferring to the MLPA process are substantively the same in the short term, the long term implications may not be the same. A deferral to the MLPA process was added as a reasonable alternative based on public comment. The intent of this alternative was to indicate that some action would be taken at a later date. The intent of a no action alternative is that

no action will be taken on the proposed project in the foreseeable future. Therefore, the Department believes that while deferring to the MLPA process will have relatively unknown results, it is different than taking no action. See also Response to Comment 20.

Comment 155: The Department is correct in its assertion of no significant environmental impacts.

Response 155: The Department agrees.

Comment 156: Section 5.3 should be reorganized to make it clearer that parts are the ecological criteria used to draft the proposed project and parts are an analysis of how the proposed project meets those criteria.

Response 156: The Department agrees. Chapter 5 has been reorganized and edits made to clarify the chapter.

Comment 157: The criteria for habitat representation comparisons on 5-12 should be more completely explained.

Response 157: See Response to Comment 55.

Comment 158: A table or set of tables comparing the habitat representation of each alternative within each biogeographical region and each habitat type would be helpful.

Response 158: Table 6-56 on page 6-66 and pages 6-74 through 6-75 of the Draft ED compare the proposed project and each alternative on the bases of total area percentage representation of each habitat. The discussion on pages 6-74 through 6-75 has been moved to page 6-66 and an additional table has been added to this section to show the overall representation of each alternative by bioregion.

Comment 159: The final document should include analysis of how each alternative meets the criteria of including existing monitoring sites, as well as information on the level of existing monitoring.

Response 159: The draft document lists the number of Channel Islands National Park Kelp Forest monitoring sites for the proposed project and each alternative on pages 5-30, 6-4, 6-16, 6-28, 6-41, and 6-54 respectively. The existing monitoring programs are listed on page 5-14. A table has been added to page 6-69 of the Final ED comparing other criteria used in developing the proposed project.

Comment 160: The final document should include information on why each alternative does or does not include a multiplier to insure against catastrophes.

Response 160: The rationale for not including additional habitat in the proposed project and each alternative are found on pages 5-31, 6-4, 6-16, 6-29, and 6-41 respectively. This rationale includes the fact that the location of reserves is proposed to reduce the potential of a single event impacting all reserves at one time, as well as other mechanisms as described in Response 36.

Comment 161: The final document should include a summary table describing the analysis with respect to ecological criteria.

Response 161: Table 6-56 summarizes the habitat representation for the proposed project and each alternative. A new table has been added to page 6-69 of the Final ED to summarize the other ecological criteria.

Comment 162: The final document should include a discussion of why impacts of congestion would not be significant under CEQA.

Response 162: See Response to Comment 5 regarding impacts of congestion.

Comment 163: Where possible, the final document should evaluate environmental benefits of the proposed project and alternatives.

Response 163: The potential benefits are discussed in general on pages 1-11 through 1-14. These benefits are further analyzed in the biological impacts and step 2 economic analysis sections for each alternative found in Chapters 5 and 6.

Comment 164: Other fisheries management activities, including the recent groundfish closures, should be included in the discussion of cumulative impacts.

Response 164: See Response to Comment 76.

Comment 165: The document should be edited by moving information on FMPs to a section discussion the impacts of other fisheries management activities.

Response 165: See Responses to Comments 4 and 108.

Comment 166: If the document's discussion of economic impacts is edited it should still contain qualitative analyses of long term costs and benefits of the proposed project.

Response 166: The Department agrees. This information is found in Chapters 5 and 6 of the Final ED.

Comment 167: The Fish and Game Commission has clear authority to establish MPAs.

Response 167: The Department agrees.

Comment 168: The final document should fully comply with the federal Endangered Species Act, including provisions of Section 7 consultations.

Response 168: Section 7 does not apply to State actions within State waters. Section 7 of the Endangered Species Act directs all Federal agencies to use their existing authorities to conserve threatened and endangered species and, in consultation with the Fish and Wildlife Service, to ensure that their actions do not jeopardize listed species or destroy or adversely modify critical habitat. Section 7 applies to management of Federal lands, as well as other Federal actions, that may affect listed species such as Federal approval of private activities through the issuance of Federal permits, licenses, or other actions. In this process, Federal agencies were contacted and involved at all stages (Draft ED Chapter 7). Species listed as threatened or endangered under the Federal Endangered Species Act are described in Section 4.3.3.8 on pages 4-131 through 4-133 and in Table 4-15 on page 4-133 of the Draft ED. The proposed project would protect habitats for a variety of these species and no "take" is expected.

Comment 169: The proposed project best accomplishes the established goals while minimizing consumptive user impacts.

Response 169: The Department agrees.

Comment 170: The proposed project was specifically sized and located to avoid high use areas while maintaining habitat representation.

Response 170: The Department agrees.

Comment 171: Due to the recent shelf closures documented long-term economic benefits to extractive user groups are substantially understated and the short-term net economic costs are substantially overstated.

Response 171: See Response to Comment 5 regarding socioeconomic impacts. The Department disagrees that the estimates for short term economic costs are dramatically overstated and long-term benefits understated. As noted in Response 76, the June 2002 Pacific Fishery Management Council action to close fishing on the continental shelf for groundfish species will reduce the economic impacts of MPAs on groundfish fisheries in the same region. This is particularly true of the rockfish fisheries. The Department feels, however, that a complete reassessment of potential economic impacts is both infeasible and unnecessary at this time. The existing analysis is based on long term averages that would not be drastically altered by a short-term change in activities. It would also be difficult to estimate changes in use patterns because the shelf closure only recently occurred. Finally, the detailed economic analysis is provided as additional information to inform the decision makers. It is a comparative analysis of the alternatives and the socioeconomic impacts of each alternative would be reduced proportionately. Thus, the overall comparison is not likely to change. Because the shelf closure is a fisheries management regulation that may be modified or removed based on annual stock assessments, the Department does not feel the long-term benefits of the proposed project are altered.

Comment 172: The no project (no action) alternative would not meet the project goals and would have negative impacts.

Response 172: The Department agrees there is a potential for negative impacts in the no action alternative. See Response to Comment 20.

Comment 173: The defer decision alternative is unacceptable as it would allow continued declines in resources.

Response 173: The Department agrees. See Response to Comment 20.

Comment 174: No coastal development permit will be required for the proposed project.

Response 174: Comment noted.

Comment 175: Expresses general support for Alternative 5. Only Alternative 5 meets the Science Advisory Panels recommendations for reserve size. Alternative 5 would protect the largest area and the greatest number of different habitats. Alternative 5 is

the only alternative that includes an insurance factor as recommended by the Science Advisory Panel.

Response 175: See Response to Comment 10.

Comment 176: The Department should include discussion of new groundfish regulations including a reassessment of potential socioeconomic impacts which would likely decrease.

Response 176: See Responses to Comments 5, 76, and 171.

Comment 177: The document should clarify the Coastal Commission jurisdiction.

Response 177: The Department agrees. Additional information provided by the Coastal Commission has been added to page 2-7.

Comment 178: The document should expand the discussion of the Southern sea otter and include the most recent population data.

Response 178: The Department agrees. Additional information has been added to page 4-131.

Comment 179: The environmental impacts of existing commercial fishing such as trawling should be discussed along with the potential benefits of marine reserves.

Response 179: The potential benefits of marine reserves are discussed in chapter 1 of the Draft ED. Information on the potential impacts of the no action alternative (which would allow existing fishing activity to continue) has been added to chapter 6 and is summarized in Response 20. Trawling has been documented as having negative impacts on various bottom habitats (e.g., Rumohr and Krost 1991; and Smith et al. 2000). The proposed project would reduce trawling impacts within the MPAs. This would be an environmental benefit. Likewise, approval of the proposed project is not expected to result in significant environmental impacts associated with trawling.

Comment 180: The economic overview of commercial fishing should be revised based on the new groundfish regulations.

Response 180: See Responses to Comments 5, 76, and 171.

Comment 181: The document's discussion of oil and gas should be expanded and include recent proposals to expand extended reach drilling and discussions of potential impacts of spills.

Response 181: The Department agrees. Additional information has been added to section 4.4.4 regarding oil and gas.

Comment 182: The information on passive use benefits should be expanded.

Response 182: The Department appreciates the California Coastal Commission's suggestions regarding "non-use economic values". Analysis of non-physical social and economic effects, however, is not required by CEQA. In this regard, the Department believes the Draft ED includes more than adequate social and economic analysis to

foster informed public decisionmaking and disclosure as those issues concern project-related environmental impacts. Along the same lines, the Department believes the Draft ED includes sufficient social and economic information and analysis to assist decisionmakers in determining whether project-related environmental effects are significant under CEQA. Quantification of passive use values requires the application of complex economic valuation techniques that do not contribute to the determination of whether the proposed project has significant adverse impacts to the environment. See also Response to Comment 12.

Comment 183: It is questionable that there was adequate community involvement to include Santa Barbara Island in the range of alternatives. It is a primary fishery for the Los Angeles and Ventura regions, and there were no community meetings held in the Los Angeles region.

Response 183: The comment occurs in the context of economic impacts to commercial fishermen. Project-related social and economic impacts, however, are not environmental impacts for purposes of CEQA. The port of origin of commercial fishermen fishing off Santa Barbara Island does not change the potential for adverse environmental impacts. See Responses to Comments 5 and 12 regarding socioeconomic impacts and Comment 48 regarding public participation.

Comment 184: The range of alternatives is inadequate because the lower end of the scope has large reserves in the western portion of the project area and little to no reserve area in the eastern portion.

Response 184: The Department disagrees that the Draft ED fails to include a reasonable range of alternatives to the proposed project. The low end of the range is an alternative to maintain the existing level of MPAs in the region, less than 1% of the project area (no-action). The Fish and Game Commission could choose this alternative if, among other reasons, it decides that existing levels of protection are adequate to sustain resources in the project area. Among the spatial alternatives for MPAs the range includes options which cover all the islands or some of the islands in the project area. This provides the Commission with various levels of protection in various areas based on the overall level of protection desired. The Department feels that this range is reasonable based on the goals and objectives of the proposed project and from both an environmental and policy perspective. The comment seems to support the concept used in developing the proposed project and larger alternatives to ensure habitat representation throughout the island chain. It also supports the Department's rationale for not choosing Alternatives 1, 2, or 3 due to their lack of complete habitat representation.

Comment 185: Why does the Department use Alternative 1, the areas of overlap, as the lower end of the range?

Response 185: The no action alternative (Alternative 7) is the low end of the range, representing less than 1% of the project area in existing MPAs. Alternative 1 was included based on input received during the extensive MRWG process as well as comments in the Fish and Game Commission forum. An alternative smaller than Alternative 1, but larger than the status quo, was not included because it would not achieve the project objectives. Specifically, the project seeks to protect representative and unique habitats, natural heritage, and recreational opportunities in areas subject to minimal human disturbance and to help sustain, conserve, protect, and rebuild marine

life populations. The smallest alternatives provided in the Draft ED can achieve some of these goals to a limited extent in a portion of the project area and within the individual MPAs. A smaller alternative would be unlikely to achieve these goals in a significant portion of the project area and possibly not within individual MPAs. In addition, the smallest alternatives are not expected to have significant benefits in the long term outside their boundaries.

Comment 186: No action was taken by the Department or Commission to address a request to change Alternatives 1 or 3 due to disproportionate impacts to Santa Barbara harbor and their failure to protect habitat in all three bioregions.

Response 186: While the maximum potential economic impact estimated for Santa Barbara harbor is higher than other ports for Alternatives 1 and 3, this is also true for the other alternatives discussed in the Draft ED. Deleting these alternatives from further consideration, as a result, would not address the concerns of the commenter. The Department, as a result, interprets the issues raised by the commenter as a generalized concern regarding proximity of the proposed reserves to vessels and commercial fisherman based in Santa Barbara. These concerns, in turn, underscore the importance of the project area to the vessels based in Santa Barbara. Finally, it bears emphasis that the Department included Alternatives 1 and 3 in the range of alternatives considered in the Draft ED, in part, in response to a number of comments received during the MRWG and Fish and Game Commission processes. See also Response to Comment 5 regarding socioeconomic impacts.

Comment 187: The document should address potential negative impacts of displaced consumptive activities. How does the Department propose to follow the Science Advisory Panel recommendation that effort should not increase in the remaining open areas?

Response 187: The potential impacts of displaced consumptive activities are discussed in the Draft ED on page 5-31, in an expanded discussion on pages 5-33 through 5-35 in the Final ED, and in Response 47. Controls on total effort in fisheries are addressed in the Fisheries Management Plan process. For the nearshore fishery, this includes a level of precaution that is consistent with the amount of area suggested for MPAs in the proposed project. The proposed project, as a result, taken together with the Fisheries Management Process, is not expected to result in significant, adverse environmental impacts. Moreover, the adaptive management component of the proposed project, as required by the Marine Life Protection Act, which includes ongoing monitoring, research and evaluation after project approval, will provide ongoing information regarding post-approval environmental conditions. This information, along with the Department's authority to recommend additional management measures to the Commission, will ensure that approval of the proposed project does not result in any significant environmental impacts. See also Response to Comment 5.

Comment 188: The document does not discuss fish behavior and mobility in relation to residence time within a marine reserve and how this will affect the benefits of marine reserves on different species.

Response 188: The Department agrees that the specific behavior of various species is not discussed. In many cases, dispersal and home range distances are unknown and thus cannot be included. This situation exemplifies the scientific uncertainty that is inherent in the development of MPAs and is recognized in the principle of adaptive

management. The design of MPAs in the proposed project is based on a variety of criteria intended to promote benefits to many species. One of the important ecological criteria used in the design of the proposed project is connectivity between MPAs through the movement and dispersal of species. This is described on page 5-15 of the Draft ED. Given the wide range of potential dispersal distances, MPA networks with a variety of reserve sizes, habitat types, and spacing are necessary to protect species of interest in the project area.

Comment 189: The document should list or rank local species that may or may not receive benefits from marine reserves. Local fish behavior and movement patterns should be cited and a ranking of benefits from spillover developed.

Response 189: The Department disagrees. Because life history parameters such as movement patterns and larval dispersal are not known for many species, this type of ranking would not be feasible. The Department has produced a document detailing the relative benefits of MPAs for a variety of species and species groups. This document has been added to the Final ED as Appendix 6.

Comment 190: How did the Department determine levels of significance for economic impacts in developing the proposed project?

Response 190: The threshold of significance for economic impacts was taken directly from CEQA and is described on page 5-43 of the Draft ED.

Comment 191: The Draft ED should note the potential area closures under the Endangered Species Act for threatened bird populations. All areas that may be considered for closure should be identified to address potential cumulative impacts.

Response 191: The Draft ED discusses the existing seasonal area closures to protect nesting and breeding brown pelican populations in Table 3-1 on page 3-2. The Department is recommending that this closure be maintained. Because these closures are not year round, they do not provide the same types of environmental benefits as an MPA. The specific purpose of seasonal closures, as noted in the comment, is to protect sea birds and is only a minor subset of the proposed project's goals and objectives. On August 22, 2002, the Department, after reviewing a petition under the California Endangered Species Act (CESA) submitted by the Pacific Seabird Group, provided a written analysis to the Commission indicating that the petitioned action to list Xantus's murrelet (*Synthliboramphus hypoleucus*) as threatened under CESA may be warranted. The Commission, however, has yet to act on the Department's recommendation. In the event the Commission concludes that the petitioned action may be warranted and the Xantus's murrelet is designated a candidate species under CESA, take of any individual members of the species would be prohibited absent authorization by the Commission or Department. At this juncture, however, the Commission has yet to take any action with respect to Xantus's murrelet under CESA and there are no proposed closures under consideration by the Commission. See also Response to Comment 124.

Comment 192: No community or MRWG meetings were held in the Los Angeles region to allow adequate community input for this region.

Response 192: The Department disagrees that there was inadequate opportunities for community input from the Los Angeles area. See Responses to Comment 48 and Comment 183.

Comment 193: The Scorpion Anchorage site, coupled with Painted Cave, will lead to excessive displacement of squid and lobster fishing.

Response 193: The maximum potential loss estimated for these areas represents approximately 1.4% of the total annual squid value and 1.4% of the total annual lobster value generated in the project area (Leeworthy and Wiley 2002). The Department does not expect that this level of loss would lead to excessive displacement. The proposed project, in turn, taken together with the Fisheries Management Process, is not expected to result in significant, adverse environmental impacts. Moreover, the adaptive management component of the proposed project, as required by the Marine Life Protection Act, which includes ongoing monitoring, research and evaluation after project approval, will provide ongoing information regarding post-approval environmental conditions. This information, along with the Department's authority to recommend additional management measures to the Commission, will ensure that approval of the proposed project does not result in any significant environmental impacts. See also Response to Comment 5.

Comment 194: What is the Department's rationale and biological benefits for creating a recreational take only site at Painted Cave when specific congestion concerns were raised from the commercial sector.

Response 194: The overall estimated economic impact to commercial fishing from the Painted Cave State Marine Reserve is 0.3% of the revenue generated in the project area (Leeworthy and Wiley 2002). This, in combination with the small size of the proposed area (2.1 nm²) was included in the consideration of comments from the commercial sector. The working draft was revised to reduce the size of this proposed site based on those same comments. The Department believes significant congestion of commercial fishing will not occur at the site. The Department's rationale for including the site is found on page 5-25 of the Draft ED. This rationale includes not only biological benefits to species inhabiting the steep rocky walls both above and below the surface, but the ecological value of a relatively undisturbed natural feature. In addition, the Department does not expect any significant environmental impacts with implementation of the proposed project. See also Response to Comment 5.

Comment 195: Concerns were raised regarding displacement and impacts to prawn trap fishing and pelagic fishing at Gull Island as well as enforcement issues with the northwest boundary.

Response 195: The maximum potential loss in annual revenue from the spot prawn fishery estimated for the Gull Island reserve is approximately 2% and for pelagic fisheries (shark, wetfish, and tuna) ranges between 0.5% and 2.5% (Leeworthy and Wiley 2002). The Department does not expect that this site would lead to significant displacement of spot prawn or pelagic fishermen. The northwest boundary runs due west from Morse Point, a known landmark, along a whole minute line of longitude. Given electronic navigation capabilities, the Department expects that this boundary will be enforceable. The proposed project, as a result, taken together with the Fisheries Management Process, is not expected to result in significant, adverse environmental impacts. Moreover, the adaptive management component of the proposed project, as required by the Marine Life Protection Act, which includes ongoing monitoring, research and evaluation after project approval, will provide ongoing information regarding post-approval environmental conditions. This information, along with the Department's authority to recommend additional management measures to the Commission, will

ensure that approval of the proposed project does not result in any significant environmental impacts. See also Response to Comment 5.

Comment 196: Concerns were raised regarding gill net fisheries outside one nautical mile in the Carrington Point site. The halibut and white sea bass fisheries analysis should be gear, rather than species specific.

Response 196: The working draft of the proposed project was altered based on this comment by moving the offshore boundary 0.5 nm south towards shore. The economic analysis was performed on species groups in an attempt to reflect the multi-species nature of many of the fisheries. Because social and economic effects are not environmental effects subject to analysis under CEQA, the Department believes the economic information provided in the Draft ED provides sufficient information to foster informed public decisionmaking on these issues. See also Responses to Comment 5 regarding socioeconomic impacts and Comment 12.

Comment 197: The Skunk Point site coupled with Carrington Point and Harris point will lead to excessive displacement and congestion of the crab and halibut fisheries.

Response 197: The Skunk Point site had no economic impact to the crab or halibut fisheries in the economic analysis (Leeworthy and Wiley 2002). The other two sites do show a relatively high maximum potential economic impact compared to other individual sites. Even so, the total maximum potential economic impact from these two sites is estimated at around 10% for both crab and flatfish commercial fishing (Leeworthy and Wiley 2002). Given that the cumulative potential economic impact to crab and flatfish fishing for the entire proposed project is less than 15% (Leeworthy and Wiley 2002), the Department does not expect, for this and other reasons, that the MPAs would lead to significant displacement or congestion. The proposed project, as a result, taken together with the Fisheries Management Process, is not expected to result in significant, adverse environmental impacts. Moreover, the adaptive management component of the proposed project, as required by the Marine Life Protection Act, which includes ongoing monitoring, research and evaluation after project approval, will provide ongoing information regarding post-approval environmental conditions. This information, along with the Department's authority to recommend additional management measures to the Commission, will ensure that approval of the proposed project does not result in any significant environmental impacts. See also Response to Comment 5.

Comment 198: How does the Department propose to deal with displaced effort from the crab fishery?

Response 198: In 2001, 35 vessels landed rock crab caught in the project area (Fish and Game Landings data). The maximum potential loss in ex-vessel revenue was estimated at less than 15% for this fishery (Leeworthy and Wiley 2002). The Department does not expect that this potential loss will lead to a significant displacement of effort from the fishery. The proposed project, as a result, taken together with the Fisheries Management Process, is not expected to result in significant, adverse environmental impacts. Moreover, the adaptive management component of the proposed project, as required by the Marine Life Protection Act, which includes ongoing monitoring, research and evaluation after project approval, will provide ongoing information regarding post-approval environmental conditions. This information, along with the Department's authority to recommend additional management measures to the

Commission, will ensure that approval of the proposed project does not result in any significant environmental impacts. See also Responses to Comments 5 and 72.

Comment 199: What is the Department's rationale for including more than 90% of the north facing habitat of San Miguel Island?

Response 199: The proposed project does not include more than 90% of the north facing habitat of San Miguel Island. Only approximately 50% of the North facing coastline is included in the Harris Point, San Miguel Island, proposed reserve. The Department included this area in the proposed project for its high habitat diversity (Figure 8-1) and the multiple species of interest that reside in the area. The Draft ED describes this in detail on pages 5-28 through 5-29.

Comment 200: The proposed project moves the western boundary of the South Point SMR one mile west from where it was originally drawn in the public process. What is the Department's rationale for moving the western boundary at South Point, Santa Rosa Island?

Response 200: The MRWG process did not result in any consensus on specific boundaries and many alternatives for this site were examined during the public process. The boundary used in the proposed project is the same as that used in the working draft presented to the MRWG members. The biggest concern identified by the commercial representatives was economic impacts to prawn fisheries on the southern edge of this MPA. The working draft was altered, moving the boundary north, in response to this comment. Among other reasons discussed in the Draft ED, the Department chose the western boundary to include additional kelp habitat, and to use both a whole minute of Longitude and a well defined point of land to ease enforcement.

Comment 201: What is the rationale for including two alternatives (1 and 3) that have the majority of reserve habitat representation in the Oregonian and Transition province and have a disproportionate impact to Santa Barbara Harbor?

Response 201: See Response to Comment 186.

Comment 202: Why does the document include alternatives that have boundaries that are confusing and difficult to enforce?

Response 202: This comment appears to focus on a particular statement in the Draft ED regarding Alternatives 1, 2 and 4. The statement notes, to the extent the Commission adopts any of these alternatives, that the associated boundaries are "confusing and difficult to enforce[.]" thereby decreasing the effectiveness of these alternatives from a fishery management perspective. (Pages E-2 and E-3). Despite their shortcomings, the Draft ED includes these alternatives in Response to Commission regulations and provisions in CEQA requiring analysis of a reasonable range of project alternatives. The Department also deemed it important to include these alternatives because their specific boundaries were developed either during the MRWG public process or, in the case of Alternative 2, proposed by a set of commercial fishermen. Inclusion of these alternatives for analysis in the Draft ED is important because of the extensive public involvement in the proposed project to date, as well as the Department's desire to adequately reflect the specifics discussed during that process. The Department interprets the statement in the Draft ED to mean that the proposed boundaries for these alternatives would reduce the effectiveness of the MPAs.

In the Department's view, this finding is yet another reason why the proposed project more adequately meets the project objectives. Please see Responses 184 and 185 for additional information.

Comment 203: How did the Department determine it's preference to establish a network with lower economic impacts than Alternatives 4 and 5.

Response 203: As described on page 1-4 of the Draft ED, the proposed project attempts to address the MRWG's consensus goals including the socioeconomic goal to "maintain long-term socioeconomic viability while minimizing short-term socioeconomic losses to all users and dependent parties." While the proposed project represents the most habitats at a level of 20% or higher, it results in lower economic impacts than both Alternatives 4 and 5. As seen in Table 6-58 on page 6-69, the proposed project has a higher habitat representation per dollar of impact than Alternatives 2, 4, or 5. This demonstrates the proposed project's potential to meet long term needs by representing appropriate levels of habitat, while minimizing short-term economic losses. See also Response to Comment 5 regarding socioeconomic impacts.

Comment 204: The document fails to recognize the phasing sub options of Alternative 2 as well as the recommendation to include Santa Barbara Island in the MLPA process.

Response 204: See Response to Comment 147.

Comment 205: The document and proposed project do not include any additional monitoring plans that will contribute to future decisions. How do the lead agencies propose to gather economic and biological data for use in future decisions such as the MLPA?

Response 205: See Response to Comment 110.

Comment 206: How does the Department propose to address fleet reduction for fisheries that are fully exploited, overcapitalized, displacement and congestion from the establishment of MPAs?

Response 206: Regulation of overall fleet size, capacity, and allowable take is addressed through the Fishery Management Plan (FMP) process. The Commission recently expressed its intent to accept the Department's recommendation regarding the Nearshore FMP, which addresses many of the finfish fisheries in the project area, and final approval of the Nearshore FMP is expected in October 2002. The Nearshore FMP will reduce capacity, limit entry into, and set a total allowable catch for the nearshore fishery. The Squid fishery management recommendations make similar adjustments. Other high priority FMPs include the sea urchin fishery. The Commission can also implement restricted access for a fishery prior to the development of a full FMP (e.g., spot prawn trap fishery). See also Responses to Comments 4 and 5.

Comment 207: Short term harvest reductions on top of area closures without proper overall fleet reduction combined with the proposed project will lead to excessive congestion, over fishing and unsustainable fisheries. The document does not adequately discuss the potential impacts of congestion of effort, or cite any local or regional studies of marine reserves for spillover benefits that offset congestion.

Response 207: See Response to Comment 5.

Comment 208: The proposed project relates specifically to State waters and is a State proposal. The action does not fall under the Federal mandates of the Regulatory Flexibility Act, Regulatory Impact Review, or NEPA. The subsequent Federal phase will be addressed by the Federal government in a separate process. This subsequent phase will be subject to all applicable federal laws, including relevant Federal regulations, the Regulatory Flexibility Act, Regulatory Impact Review, and NEPA.

Response 208: The proposed project relates specifically to State waters and is a State proposal. The action does not fall under the Federal mandates of the Regulatory Flexibility Act, Regulatory Impact Review, or NEPA. The subsequent Federal phase would be addressed in a separate process. This subsequent phase would be required to meet the requirements of Federal regulations including the Regulatory Flexibility Act, Regulatory Impact Review, and NEPA.

Comment 209: The statement that "little is known about the distribution of hard sediments on the deep continental shelf and slope in the Sanctuary" is not made in the Habitat Representation section for the proposed project.

Response 209: The comment seems to confuse the State waters portion of the analysis with the cumulative State and Federal waters analysis. Because these habitats are not found within State waters, the Draft ED notes their absence from the representation. With regards to the proposed project, Page 5-19 states "[d]eeper habitats are poorly represented in all regions due to their absence in State Waters." With regards to the cumulative representation in State and Federal waters, Page 5-33 states, "[l]ittle is know about the distribution of hard sediments on the deep continental shelf and slope in the Oregonian and Californian Bioregions." Because the discussion of cumulative impacts is combined in a single section for each of the other alternatives, this statement is made in the same paragraph as that for State waters.

Comment 210: It should be noted that fisheries dependent on kelp availability may experience additional congestion from additional loss of fishing grounds due to limited kelp abundance during El Niño or other events.

Response 210: In order to meet the scientific design criteria and goals, reserves must be replicated so that at least some reserves will maintain kelp habitat even when natural abundances are low. Replicates must contain kelp habitat to ensure this occurs. The Fishery Management Plan process under MLMA would include provisions for changes in allowable catch when abundance or available resources drop. Thus, if a naturally occurring fluctuation led to lower resource availability, the fishery's allowable catch would be reduced to maintain appropriate stock biomass. The proposed project, as a result, taken together with the Fisheries Management Process, is not expected to result in significant, adverse environmental impacts. Moreover, the adaptive management component of the proposed project, as required by the Marine Life Protection Act, which includes ongoing monitoring, research and evaluation after project approval, will provide ongoing information regarding post-approval environmental conditions. This information, along with the Department's authority to recommend additional management measures to the Commission, will ensure that approval of the proposed project does not result in any significant environmental impacts. See also Response to Comment 5 regarding adaptive management.

Comment 211: The proposed project is the minimum protection necessary.

Response 211: The Department disagrees. The proposed project represents and replicates a wide range of habitats within the project area (see Draft ED Chapter 5). Each alternative represents varying amounts of habitat, including higher and lower levels of representation. However, the proposed project includes not only the MLPA goal to represent habitat, but also the other goals of the act, which are not ranked in the MLPA and are seen as an overall framework for the State's MPAs. These include: to protect natural diversity and abundance, to help sustain conserve and protect marine life, to improve recreational, educational and study opportunities in areas subject to minimal human disturbance, and to protect marine natural heritage, including representative habitats. See also Response to Comment 10.

Comment 212: Expresses support for Alternative 5.

Response 212: See Response 10.

Comment 213: The proposed project does not fulfill the biodiversity goal and other key MLPA mandates to balance long-term interests with short-term impacts.

Response 213: The Department disagrees. The proposed project encompasses a wide range of habitats within the project area (see Draft ED Chapter 5). Each alternative represents varying amounts of habitat, including higher and lower levels of representation. However, the proposed project includes not only the MLPA goal to represent habitat, but also the other goals of the act, which are not ranked in the MLPA and are seen as an overall framework for the State's MPAs. These include: to protect natural diversity and abundance, to help sustain conserve and protect marine life, to improve recreational, educational and study opportunities in areas subject to minimal human disturbance, and to protect marine natural heritage, including representative habitats. See also Response to Comment 10.

Comment 214: The proposed project does not meet MRWG Ecosystem Biodiversity Goal.

Response 214: See Response 10.

Comment 216: Biogeographical representation as it pertains to the amount of kelp forest and rocky habitat is under represented. In particular, there is inadequate representation of kelp forest habitats in both the proposed project (21%) and Alternative 5 (24%), this habitat should be represented at closer to 30-50%.

Response 216: See Response 78. Additionally, rocky habitats in the nearshore environment are represented at between 20 and 30% in the proposed project. The Department believes that this level of representation, along with other management measures, is sufficient to meet ecological objectives.

Comment 217: It is unclear what is meant by the last two comments in section 2.7, Areas of Concern, regarding environmental allocation and conflicts among user groups.

Response 217: The community raised both of these concerns during the MRWG process. In both instances, the concerns are more appropriately addressed through the FMP process than through the placing of, or need for, the MPAs contemplated by the

proposed project because both issues concern allocation of resources between groups. The MPAs contemplated by the proposed project, in contrast, address environmental and fisheries concerns, and not resource allocation among user groups.

Comment 218: The Fish and Wildlife Service is the agency that is responsible for the implementation of ESA as it pertains to sea otters.

Response 218: Comment noted. A clarifying statement to this effect has been added to page 4-132.

Comment 219: The southern sea otter is listed as "threatened" not "endangered" under the Federal ESA.

Response 219: Comment noted. The text on page 4-132 has been corrected.

Comment 220: Feeding of marine wildlife for the purposes of viewing, and other forms of wildlife harassment, needs to be better addressed in developing management plans for Marine Protected Areas within the Channel Islands National Marine Sanctuary. Feeding and other such forms of harassment result in deleterious effects on sharks and other fishes.

Response 220: Existing ecological reserve regulations prohibit the feeding of wildlife (Title 14, California Code of Regulations, Section 630 (12)). The proposed project would add Section 632 to Title 14, specific to Marine Protected Areas. This section would prohibit the feeding of wildlife within Marine Protected Areas (Proposed Section 632 (6)). The proposed regulation can be found on page A2-17 of the draft document. In the Department's view, existing regulations and the proposed regulation will avoid or reduce to below a level of significance the prospect of project-related adverse impacts on sharks and other fishes.

Comment 221: The proposal should require the use of specific electronic equipment when fishing in the region. This would make enforcement of and navigation around boundaries simpler and boundary violations easier to prosecute.

Response 221: Department of Fish and Game enforcement staff will develop an enforcement plan for Marine Protected Areas. If this plan requires the use of specific electronic equipment, regulations will be developed to implement the change. See also Response to Comment 17.

8.3 Copy of Comments Received

The closing date for comments on the Draft ED was September 1, 2002 at 5:00 p.m. Because this date fell on a Sunday and the following Monday was a State holiday, comments were accepted until September 3, 2002 at 5:00 p.m. Following are copies of all written comments received during the Draft ED comment period.

NOTE: Reproductions of the comments received are not included in this electronic copy of the Final ED.

Table 8-2. Names and locations of people who transmitted a form email from the Environmental Defense Action Network web site (Comment E-03-01).

Name	City	State/Country	Name	City	State/Country
Erik & Lori Booth	Ironwood	Michigan	Alexandra Avenius	Madison Heights	Michigan
Aaron & Anna Morris	Coconut Grove	Florida	Anthony Averett	San Diego	California
Bill & Marilyn Voorhies	West Tremont	Maine	Catherine Avery	Front Royal	Virginia
James & Samantha Mayo	Little Rock	Arkansas	Janet Ayres	Houston	Texas
Kathryn & Paul Sanko	Turkhamnock	Pennsylvania	Helen B. Grumman	Newton	Massachusetts
Barbara & Charles Mistele	Lake Bluff	Illinois	George B. and Molly Hutchinson	Medford	Oregon
Lisa & Dylan stiel	Santa Ana	Connecticut	Jason B. Ball	Austin	Texas
Hank & Carol Moore	Hibbing	Minnesota	katherine babiak	new york	New York
Janice & Greg Dlugosz	Beachwood	New Jersey	Andres Baca	Miami	Florida
Ken & Dawn Mettler	Rockbridge	Ohio	Michael Badalamenti	San Luis Obispo	California
Richard & Mary Chaisson	Oxford	Connecticut	Edward Bade	Berkeley	California
Martha & Edward Leahy	Winchester	Massachusetts	Alison Baden	Dallas	Texas
Paul & Kathryn Sanko	Turkhamnock	Pennsylvania	Brenda Badiuzzi	Marietta	Georgia
L. A. Pam Thornton	Tularosa	New Mexico	Frank Baele	Santa Monica	California
D. A. Wall	Brandon	South Dakota	Jacquelyn Baetz	Albany	New York
Albert A. Gaydos	Woodhaven	New York	Joanna Bagatta	Mahopac	New York
James A. Pierson	Charleston	South Carolina	Linda Bagneschi	Novato	California
David A. Jones	Mexico Beach	Florida	Donna Bahr-Landsea	Miami	Florida
Maureen A. Flannery	Berea	Kentucky	Sean Bailey	Seattle	Washington
William Aaron III	Dallas	Texas	Pamela Baker	East Lansing	Michigan
Stephanie Abbott	Denton	Texas	Connie Baker	Winters	California
Zaarah Abdul-Zahir	Cleveland	Ohio	Rhonda Baker	Akron	Ohio
Barry Abrams	New York	New York	Sharon Baker	Petersburg	Tennessee
Skye Abt	Lafayette	Indiana	Wesley Baker	Kingsport	Tennessee
Kris Acevedo	Revere	Massachusetts	Ethel Bakke	Lake Orion	Michigan
Mina Acevedo	Morton Grove	Illinois	Paula Bakker	Rotterdam	Netherlands
Wendy Ackerley	St. Pauls	North Carolina	Tom Baldwin	Ashland	Oregon
Adrienne Acoba	Santa Maria	California	Debra Ballou	Orono	Maine
Mike Acton	Hudsonville	Michigan	Gypsy Bandita	Montgomery	Texas
Sara Adams	Leeds	United Kingdom	Nathalie Banger	Kingston	Canada
Alice Adams	murphysboro	Illinois	Lucy Bannister	Boerne	Texas
Barb Adams	San Antonio	Texas	Kelly Baraka	Mill Valley	California
Jennifer Adler	Kenmore	Washington	Clelia Barbadoro	Rome	Italy
Felix Aguilar, MD	Long Beach	California	Diana Barbee	Calabasas	California
Sanjay Ahluwalia	Covina	California	Jeanne Barber	San Jose	California
Zered Ahmad	Amsterdam	Netherlands	Marilyn Barefoot	W. Lafayette	Indiana
Laurie Alcaino	Campbell	California	Rachel Barge	San Clemente	California
J. Alan Pollard	Richardson	Texas	Lauren Barlow	Columbia	Missouri
David Alana	Sebastopol	California	Deb Barnichael	Phoenix	Arizona
Annette Albert	Revere	Massachusetts	Rebecca Barnes	Lincolnton	North Carolina
Evan Albright	San Luis Obispo	California	Jaime Barnes	Dunkirk	New York
Lori Albright	Connellsville	Pennsylvania	Brenda Barnes	Hickory	North Carolina
Lori Albright	Connellsville	Pennsylvania	Kathryn Barnes	Sherwood	Michigan
Marsha Alexander	CARMEL	Indiana	Daniel Barnett	Bronx	New York
Thomas Alexander	Quincy	California	Carina Barnett-Loro	Durham	North Carolina
Alexis Alicea	Patrick AFB	Florida	Gordon Barrett	Saratoga	California
Michelle Aljundi	Hudson	Florida	Lori Barrow	Virginia Beach	Virginia
Dr. Allan Olson	Marquette	Michigan	Karen Barrows	Nordland	Washington
Aneda Allen	Mesa	Arizona	Michael Barrows	Pacifica	California
Janet Allen	Syracuse	New York	Trisha Barry	Tamarac	Florida
Angela Allen	Belton	Texas	Edward Bartel	Anaheim	California
Thomas Allgaier	Palm Bay	Florida	John Barthel	Owatonna	Minnesota
Eric Althoff	Altadena	California	William Bartleman	El Cajon	California
Dr. Amanda Landis-Hanna	Auburn	Alabama	Darryle Bates	Cuyahoga Falls	Ohio
Arthur Ambrozewski	Auburn	Indiana	John Bates	San Francisco	California
Frank and Phyllis Bottomley	Hornell	New York	Virginia Batson	Philadelphia	Pennsylvania
Gene and Doris Peters	Mitchel	South Dakota	Lynn Bauer	Fairfax	California
John and Lucy Perko	Ojai	California	Saskia Baur	Scotts Valley	California
Eric and Mary Harte	Berkeley	California	Rita Bawden	Plano	Texas
Wayne and Sharon Siggins	Piscataway	New Jersey	Nigel Baxter	London	United Kingdom
Tom and Barbara Hamilton	Media	Pennsylvania	Daniel Bayona	Bogota	Colombia
Rollin and Lynne Young	Oceanside	California	Wayne Beach	Phippsburg	Maine
Susan and Jim Gear	Napa	California	Joyce Beattie	Mountain View	California
Ray and Lorraine Crowley	Medford	Oregon	Marc Beauchamp	Napa	California
Linda and Bill Lane	Georgetown	Texas	Renee Becht	Haleiwa	Hawaii
Eileen Anderson	Montpelier	Virginia	Carter Beckett	Santa Fe	New Mexico
David Anderson	Columbus	Ohio	Thea Beckett	Santa Fe	New Mexico
Jane Anderson	Athens	Georgia	Azel Beckner	Bowling Green	Kentucky
John Anderson	Mebane	North Carolina	Dan Behrens	Doylestown	Pennsylvania
Constance Anderson	Maple Valley	Washington	Stephen Beliaeff	Fresno	California
Don Anderson	Sevierville	Tennessee	ann bell	augusta	Georgia
Kelly Anderton	Corvallis	Oregon	Robert Bell, III	Chapel Hill	North Carolina
Gian Andrea Morresi	Denver	Colorado	Peggy Beltrami	Houston	Texas
Gabriel Andres Thoui	Fairfield	Connecticut	Shari Bence	Cambridge	Massachusetts
Philip Andrews	Minneapolis	Minnesota	Jill Bender	New Hamburg	California
M. Anga Rebane	Fairfax	California	Betty Bender	Palmdale	California
Mary Ann Hilgeman	Las Vegas	Nevada	Donna Benjamin	Santa Fe	New Mexico
Jo Anne Smith	St Louis	Missouri	Sonya Bennett	Harrisburg	Pennsylvania
Mary Anne Barbic	Christiansburg	Virginia	Darleen Benson	Asheville	North Carolina
Lisa Anne Zilney	S. Euclid	Ohio	Don Bentley	Phoenix	Arizona
Nika Annon	Knoxville	Tennessee	Cheryl Berg	pahoa	Hawaii
Susana Anschutz	Cochiti Lake	New Mexico	Georges Berges	San Diego	California
Anthony Antich	Miami	Florida	Carol Bernacchi	LA	California
Lisa Antilla	New York	New York	William Berry	Tampa	Florida
Ana Antunes	Lacey	Washington	Ellen Berryman	Auburn	California
Gregory Apo	Sintra	Portugal	Shawn Bert	La Mirada	California
Tanya Aporite	Los Angeles	California	Harrison Bertram	SCHAUMBURG	Illinois
Erin App	Henderson	Nevada	Michael Besem	Los Angeles	California
Natalie Aragno	Dallas	Texas	Michael Besem	Los Angeles	California
Isabel Araujo	Chicago	Illinois	David Beskind	W. Simsbury	Connecticut
Sanessa Araujo	Mexico, D.F.	Mexico	Stacey Betts	Center Cross	Virginia
Sandra Archer	Cardiff	California	Andrew Bezella	Chicago	Illinois
Domenic Ariaudo	Delta	Florida	Russell Bezette	LaVerkin	Utah
Christie Ariotta	Staten Island	New York	Animesh Bhattacharya	Kent	Ohio
Nancy Arner	Natick	Massachusetts	Macarena Bianchi	Los Angeles	California
Lynn Armstrong	Reading	Pennsylvania	John Biddulph	Hamilton	New Jersey
Corinne Armstrong	NY	New York	Rita Bieszk	Lombard	Illinois
Kimberly Armstrong	Pasadena	California	Jessica Bigby	Richardson	Texas
Melissa Armstrong	Chicago	Illinois	michael blecki	Brookhaven	New York
Rebecca Armhold	Davie	Florida	Jennifer Blotta	Wyndmoor	Pennsylvania
Jillian Aronson	Charlotte	North Carolina	Jennifer Birch	Bellevue	Washington
Ardith Arrington	Orlando	Florida	Wendy Biser	Littleton	Colorado
carol artz	Seattle	Washington	Jeremy Bishko	Cleveland Heights	Ohio
David Asselin	hagerstown	Maryland	Emily Bishop	Goleta	California
Neil Asselin	Greene	Maine	Auri Biswas	Fremont	California
Kimberly Atkin	Macomb	Michigan	Aurion Biswas	Fremont	California
Julie Atwell	Brocton	Massachusetts	John Blackston	Boulder City	Nevada
Jeff Auch	Northport	Alabama	Robert Blackston	Winter Haven	Florida
Michele Augustine	Montague	Michigan	Melinda Blake	Sewell	New Jersey
Peter Auster	Madison	Wisconsin	Charles Blakeslee	Playa del Rey	California
	Chester	Connecticut		Tucson	Arizona

Name	City	State/Country
Sharon Blank	Santa Monica	California
Kristie Blase	Silver Spring	Maryland
Blaine Blinston	Edmonton	Canada
Catarina Blitz	Nashville	Tennessee
Steve Bloodworth	Fort Worth	Texas
Justin Bloom	Bronx	New York
Cynthia Bloomquist	Harvard	Massachusetts
Rebecca Blue	San Diego	California
Bruce Blum	Columbia	Maryland
Audrey Blumenau	Santa Cruz	California
Leo Blyler	Las Vegas	Nevada
Nicole Blythe	Stuart	Florida
Linda Boag	Long Beach	California
Kathryn Bodnarchuk		Great Britain
Thomas Boesch	Cuyahoga Falls	Ohio
Rachel Boexk	Borden	Canada
Ryan Boggan	Sterett	Alabama
Holly Bognar	Richmond	Virginia
Lori Bohannon	Simi Valley	California
Connie Boitano	Seattle	Washington
Julie Bolcer	South Orange	New Jersey
Julie Bond	Edgerton	Wisconsin
Marliese Bonk	Pittsburgh	Pennsylvania
Victoria Bonsignore	Miami	Florida
James BonTempo	Chicago	Illinois
Ivy Borden	Williamsville	New York
Liz Borman	Berkeley	California
Pamela Borres	Pinellas Park	Florida
Fran Bosche	Bailey	Colorado
Mathilde Boton	Athens	Greece
Alexandre Bottos	Mirassol/SP	Brazil
Julie Bourns	Washington	District of Columbia
Benita Bowen	Bellingham	Washington
Karin Boyce	Roseville	Minnesota
Timothy Boyd	Myrtle Beach	South Carolina
Kenneth Bozek	South Hadley	Massachusetts
Beverly Bradley	Marietta	Ohio
Lorraine Brady	Austin	Texas
Chris Branam	Fayetteville	Arkansas
Glen Brandenburg	Vista	California
Ken Brandis	Tucson	Arizona
Rick Brandon	Tehachapi	California
Molly Brann	Houston	Texas
Michelle Bratt	Ashton	Idaho
Randy Braun	South Hadley	Massachusetts
Pam Brawn	Jefferson	Maine
Louise Bray	Culver City	California
Aidan Brendan	Viroqua	Wisconsin
Cori Brendle	Largo	Florida
Nancy Brennan	Casper	Wyoming
Thomas Bressani	Deltona	Florida
Deanna Brewster	Essex Jct	Vermont
Shannon Briare	Elma	Washington
Sara Briddell	Adel	Iowa
Susan Bridges	Highland	Indiana
Doug Bridwell	Olathe	Kansas
Ian Briggs	Santa Cruz	California
Jim Brillon	Anaheim	California
Khadijah Britton	Cambridge	Massachusetts
Erica Brodman	Reading	Pennsylvania
Laurie Bronson	Montverde	Florida
Dan Brook	SF	California
Eliet Brookes	Milwaukee	Wisconsin
James Brooks	Fort Lauderdale	Florida
Kelsey Brooks	Athens	Georgia
Rebecca Brooks	Louisville	Kentucky
Michelle Brooks	Los Angeles	California
Bonnie Bross	Kansas City	Missouri
Deb Brower	Humtulpis	Washington
Deidre Brown	Croton Falls	New York
Phil Brown	Chattahoochee	Florida
Jim Brown	Los Angeles	California
Beth Brown	Limington	Maine
Samantha Brown	Palos Verdes Estates	California
Warren Brown	Oak Harbor	Washington
Tristan Brown	Franklin	Michigan
Kacey Browne	Los Angeles	California
Susan Browne	Atlanta	Georgia
Sid Browne	Chico	California
Thomas Browne	Green Bay	Wisconsin
Diana Brownell	Somerset	New Jersey
Destiny Browning	Davenport	Iowa
Chelsea Browning	Port Orchard	Washington
Natasja Brozius	Wilnis	Netherlands
Abigail Bruce	Oakland	California
Timothy Bruck	Mentor	Ohio
Dianne Brueckner	Carlsbad	California
Rita Bruner	Mickleton	New Jersey
Jeannie Brunnick	Manhattan Beach	California
Ricard Bruno	boulogne billancourt	France
Kathy Bruns	Ventura	California
Elizabeth Bryan	Leavenworth	Kansas
Pamela Bryson	Houston	Texas
Lara Bubeck	Waterbury	Connecticut
Dwight Buck	Mammoth Lakes	California
Anne Buffard	Seattle	Washington
Vera Buk-Bjerre	Kent	Ohio
Gena Bukur	Kissimmee	Florida
Melissa Bulkowski	Byron Center	Michigan
N Bullock	New York	New York
Barbara Bullock-Wilson	Carmel	California
Terry Bunch	San Diego	California
Brea Burgie	Greeley	Colorado
Janet Burgoon	Malvern	Pennsylvania
Beverly Burk	New York	New York
Patricia Burke	Westchester	Illinois
Molly Burke	Wilkes-Barre	Pennsylvania
Pauline Burkhart	Jacksonville	Florida
Jennifer Burks	Louisville	Kentucky
Deborah Burnett	Brooklyn	New York
Jodi Burns	Arvada	Colorado
Kelly Burrington	Altamonte Springs	Florida
Solace Burris	Washougal	Washington
Stephen Burrows	Birmingham	Michigan

Name	City	State/Country
Rachael Bush	Ogden	Utah
Martha Bushnell	Boulder	Colorado
Bruce Bushong	Muskogee	Oklahoma
Bill Buss	Corrales	New Mexico
Brenda Bussell	Mastic Beach	New York
Lisa Butch	Meadville	Pennsylvania
Larry Butcher	Sacramento	California
David Butlein	Mountain View	California
Brenda Butler	Beth	Illinois
Gwendolyn Butler	Malden	Massachusetts
Darrol Butler	Redding	California
Doug Butler	Painted Post	California
Sarah Butler	Orinda	California
Thomas Butler	San Francisco	California
Debra Butterworth	San Antonio	Texas
Charles Byrne	Chicago	Illinois
Patricia Byrnes	Mill Valley	California
Jason Byrnes	Mishawaka	Indiana
Allison Byrum	Wimberley	Texas
Beverly Byrum	Rotonda West	Florida
Peter C. Reilly Flannery	Berea	Kentucky
Lori C.	Virginia Beach	Virginia
Raquel Cabrera	Miami	Florida
Gregory Cadieux	Burlington	Vermont
Tania Callouet	San Diego	California
Nancy Cain	Leadville	Colorado
Karen Cairns	Blacksburg	Virginia
Antonio Calabria	San Antonio	Texas
Marianne Calame-Berger	Albany	California
Leann Calhoun	Columbus	Ohio
Krys Call	Santa Cruz	California
Evelyn Callahan	Brunswick	Georgia
Jill Callahan	Round Lake Beach	Illinois
Annie Calpe	Orlando	Florida
Julie Calvert	San Diego	California
Dave Cambrai	Centereach	New York
Jeff Cameron-Martin	Pasadena	California
William Camp	Byhalia	Mississippi
Kathleen Campbell	Berwick	Maine
Victoria Campbell	Orange	California
Lisa Canape	Salt Lake City	Utah
Tiffany Candelaria	Phoenix	Arizona
David Cann	Oakland	California
Crista Cannariato	Santa Cruz	California
Jamie Cannon	Eugene	Oregon
Misty Cao	Arlington	Texas
Paula Capece	Flourtown	Pennsylvania
Rosemary Cardello-Letch	Newburyport	Massachusetts
Catherine Cardelus	Gainesville	Florida
Stephen Carey	Drexel Hill	Pennsylvania
Joel Carico	Orange	California
David Carico	San Luis Obispo	California
Elan Carlson	Phoenix	Arizona
Mitch Carpen	Plainfield	New Jersey
Victor Carpio	Fort Collins	Colorado
Adrianne Carr	Stanford	California
Bryanna Carroll	Chicago	Illinois
Dru Carter	Plainwell	Michigan
Amanda Carter	Brooklyn	New York
Marian Carter	West Covina	California
Jessica Caskey	San Jose	California
Donna Cassidy-Hanley	Freewille	New York
Rachel Castor	Corvallis	Oregon
Ana Castro	Norwalk	California
Robert Cataldo	San Juan Capistrano	California
Rain Cater	Atlanta	Georgia
David Cayford	santa rosa	California
JoAnn Celaschi	Charleroi	Pennsylvania
Deanna Cerrone	Quechee	Vermont
Julio Cesar Torres	Santa Cruz	Venezuela
Bill Chadwick	Markham, Ontario	Canada
Charlana Chaffee	San Diego	California
Rhonda Chaikin	Lafayette	California
Joy Chambers	Milford	Massachusetts
Elaine Chang	Berkeley	California
Roger Chao	Blackburn	Australia
Mary Chapman	Ashland	Oregon
Betty Chapman	St. Louis	Missouri
Robert Chappell	Tucker	Georgia
Martha Chase	Johnson City	Tennessee
Adam Chase	Owings Mills	Maryland
Aaron Chase	Truckee	California
Kim Chase	New York	New York
Howard Chasin	Bakersfield	California
Catherine Chatfield	South Lake City	Utah
Margaret Chemela	South Orange	New Jersey
Lora Child	St. Paul	Minnesota
Aneel China	Santa Cruz	California
Dorothy Chiu	Alpharetta	Georgia
Leah Choi	Chatsworth	California
Michele Chourret	Memphis	Tennessee
Janice Christensen	Dallas	Texas
Tracey Christensen-Burgess	Springfield	Missouri
Kevin Christensen-Burgess	Springfield	Missouri
Lynn Christie	Pittsburgh	Pennsylvania
Mizpah Christina Thomas	Woodland Park	Colorado
S Christoff	Santa Barbara	California
Sandrine Christophe	Woodside	New York
Searles Christopher	Brooklyn	New York
Michael Christy	Desert Hot Springs	California
Lisa Chun	Lihue	Hawaii
Denise Chun	San Diego	California
Amy Chuo	Flushing	New York
Theresa Ciavarella	Altoona	Pennsylvania
Kathleen Cipriano	Deltona	Florida
Charmaine Clapp	Rosemead	California
Henry Clarence	Berkeley	California
Alice Clark	Tooele	Utah
Cristina Clark	Parrville	Pennsylvania
Craig Clark	metuchen	New Jersey
Diana Clark	Sarasota	Florida
Fritz Clark	Lenexa	Kansas
Kit Clark	Santa Cruz	California

Name	City	State/Country
Kathleen Clayton	Cape Girardeau	Missouri
Edna Clegg	Paris	Texas
Regina Clewell	Davenport	Iowa
Mike Clipka	Lathrop	California
Loren Clive	Berkeley	California
Carrie Coakley	New York	New York
Patsy Coats	Birmingham	Alabama
Kathy Coffman	Schaumburg	Illinois
James Cogan	Novato	California
Nayana Cohen	Edgewood	New Mexico
Anne Cohen	Takoma Park	Maryland
Lawrence Cohen	Takoma Park	Maryland
Dana Cole	Tampa	Florida
Donna Cole	Elkmont	Alabama
Angela Coleman	mableton	Georgia
Jennifer Coleman	Hendersonville	Tennessee
Leslie Coles	Cincinnati	Ohio
Mark Collier	Boulder	Colorado
Elizabeth Collins	Birmingham	Alabama
Taeya Collins	Ft. Belvoir	Virginia
Rene Colucci	Hopewell Junction	New York
Patrick Colvin	Turlock	California
Sean Compost	San Diego	California
Chuck Comstock	Morrisville	North Carolina
Gabe Condie	Clayton	North Carolina
Lindsay Conlon	Big Bear Lake	California
Zigmund Connell	Webster	Massachusetts
karen Connelly	Fort Drum	New York
Vicki Connon	south bend	Indiana
Kristin Conover	Carlsbad	California
Michael Conroy	Portland	Oregon
Gabriel Constans	Santa Cruz	California
Rita Contreras Avery	San Antonio	Texas
Thomas Conway	methuen	Massachusetts
Marcia Conway	Hinesburg	Vermont
Erin Cook	Celina	Ohio
Joshua Cook	Austin	Texas
Stephanie Coonce	Redondo Beach	California
Kris Coontz	Santa Cruz	California
Lily Copenagle	New York	New York
Stephanie Cordeau	Quebec	Canada
Reo Cordes	Oceanside	California
Shelley Cornett	Kerrville	Texas
Stephanie Corona	Downey	California
Terry Corris	Springfield	Oregon
Pamela Corwin	Olympia	Washington
Deidre Corwyn	Norcross	Georgia
Scott Cosby	Ontario	Canada
Bill Cosentino	Stratford	Connecticut
Francisco Costa	Cathedral City	California
Katherine Cote	Milford	Massachusetts
Glenn Cotten	Hartsdale	New York
Leah Couk	Hutto	Texas
Jesse Counterman	Sioux City	Iowa
Linda Cousland	Millis	Massachusetts
Kevin Covey	Seattle	Washington
Scott Cowan	Chicago	Illinois
Kellie Cowper	Mililani	Hawaii
Christi Cox	Durham	California
Mike Cozens	London	New York
Feather Craighead	Connerville	Indiana
Shannon Cram	Arcata	California
Laurie Creighton	Buckeye	Arizona
Laurie Creighton	Buckeye	Arizona
Kellie Cremer	Pueblo	Colorado
Tammi Crider	gravois mills	Missouri
Shonna Crompton	Borup	Minnesota
Denise Cronin	Imperial	Missouri
Candace Cross	Riverside	California
Tonya Cross-Noblett	Caneyville	Kentucky
Nancy Crouse	Stewartsville	New Jersey
Michael Crowden	Kansas City	Missouri
Patricia Crowe	Methuen	Massachusetts
Lisa Crummett	Fullerton	California
Ana Cruz	Austin	Texas
Jianing Cui	Beijing	China
Lisa Cuizon	Thousand Oaks	California
Christina Cullen	Occidental	California
Vanessa Curbello	Briarwood	New York
Kristi Curtis	Watertown	New York
Tim Cuthbertson	Vernonia	Oregon
Susan Cutler	Vista	California
Maria Czyz	Valrico	Florida
John D Zabcik	Houston	Texas
Mary D. Kurtz	Athens	Georgia
Andrew D.S. Blair	Rochester	New York
Janet D'Annunzio-Ellis	Arlington	Massachusetts
Anthony D'Auria	Hanover	New Hampshire
Ed D'Urso	Piermont	New York
Debbie Daggett	Monroe City	Missouri
Sasa Daily	Phoenix	Arizona
Winfred Dale Merriman	Dunlap	Tennessee
Beth Dallam	Jersey City	New Jersey
Angela Dallara	Richmond Hill	New York
Robert D'Amato	Morris	New York
Jason Daniel Cohen	Takoma Park	Maryland
Val Daniel	Houston	Texas
Valerie Daniel	Philadelphia	Pennsylvania
Patricia Daniels	Manassas	Virginia
Suzanne Danielson	Fredericksburg	Virginia
Grace Darcy	Carmel Valley	California
Elizabeth Darr	San Francisco	California
Maggie Dart-Padover	San Francisco	California
Inez David	Berlin	Germany
Jessica Davidson	Clackamas	Oregon
George Davis	Las Vegas	Nevada
Lee Davis	Clacton on Sea	United Kingdom
Marion Davis	Arlington	Virginia
Sean Davison	San Francisco	California
Steven Dawes	Omaha	Nebraska
Shirley Dawkins	Stanley	North Carolina
D.M. de Leeuw	Almere	Netherlands
Erin de los Cobos	Los Angeles	California
Jackie de Vries	Mahwah	New Jersey
Peter de Lijser	Orange	California

Name	City	State/Country
Ken De Stasio	Rutland	Vermont
Monique De Jesus	White Plains	New York
Willow Dea	Mountain View	California
Angi Dean	Beaumont	Texas
Rachel Dean	Santa Cruz	California
Carol DeAntoni	Crestone	Colorado
Patty Debenham	San Francisco	California
Bill DeBoer	Jenison	Michigan
Melissa DeCosta	Lake Panasoffkee	Florida
Chere DeForest	Portland	Oregon
Denise DeGeare	Omaha	Nebraska
Deanna DeLaney	Bedford	Indiana
Alejandra Delgado	Mexico City	Mexico
Leigh Delgado	Mayer	Arizona
Anthony DelGreco	New York	New York
John Dellaguardia	Coram	New York
Ann DellLolis	Fresno	California
Amanda DeLong	Vestavia Hills	Alabama
J DeMarco	Lockwood	New York
Christi DeMark	Hoboken	New Jersey
Claire Deneka	Concord	New Hampshire
John Dennis	Stacy	Minnesota
ALicia Denofrio	Suisun	California
Philip Dequigne	Eagle Point	Oregon
Chad Derosier	Milford	New Hampshire
James Derzon	Falls Church	Virginia
Andy Dettling	farmington hills	Michigan
Deiter Dettling	Portland	Oregon
Lou Detwiler	Pahrump	Nevada
Lisa DeVaney	Portland	Oregon
Lisa DeVaney	Portland	Oregon
Lisa DeVaney	Portland	Oregon
Andrue Devine	Eglin AFB	Florida
Alan Dewey	Alfred Station	New York
Andrea Dewey	Miami	Florida
Diana Dexter	Overland Park	Kansas
Ann Di Donato	Rancho Cucamonga	California
Kathleen Dicarlo	Coconut Creek	Florida
Angie DiCesare	Nashua	New Hampshire
Shawn Dicken	Beaverton	Michigan
Mary Diebels	Plano	Texas
Steve Diebels	Plano	Texas
Ann Diego	Louisville	Kentucky
Kelly Dietrich	Dulles	Virgini
Kelli Dietz	Wauconda	Illinois
Travis Dietz	San Francisco	California
Gerard DiNome	Los Angeles	California
Lisa DiNunzio	Vineland	New Jersey
Valeria Dismukes	Los Angeles	California
Jennifer Dixon	Albany	New York
Kirsty Dixon	Hobart	Australia
Elizabeth Dodd	Boca Raton	Florida
Sherri Doherty	KC	Missouri
Nancy Dollard	Valparaiso	Indiana
Jill Dominguez	Westminster	California
Sylvia, Don & Emily Leach	Wellesley	Massachusetts
Antonio Donato	Serrano	Italy
Charlene Donath	West Hills	California
Marguerite Donnay	Miami	Florida
Anthony Donnici	Kansas City	Missouri
Thomas Donohue	Redondo Beach	California
John Donovan	El Cerrito	California
Abby Donovan	Eugene	Oregon
Heather Dooley	San Francisco	California
Bridget Doran	Ann Arbor	Michigan
Barbara Dorf	Aransas Pass	Texas
Lisa Dorward	Canoga Park	California
Carolyn Doswell	Studio City	California
Deanna Doubledee	Haymarket	Virginia
Felice Douglas	Forest Hills	New York
Chere Douglas	El Cerrito	California
Dianne Douglas	Phoenix	Arizona
Terri Douglass	Hamilton	Montana
Christine Doules	Philadelphia	Pennsylvania
Duane Dow	Granite Falls	Washington
Erin Dowling	Ann Arbor	Michigan
Charles Dowe	Boston	Massachusetts
Rachel Dowell	Bexley	Ohio
Simon Dowsey	Edmonton,AB	Canada
Sorin Dragan	Fairfax	Virginia
H Drake	Chapel Hill	North Carolina
Patricia Dray	Mission	Canada
Joel Drembus	Reston	Virginia
Donald Dresser	Hockessin	Delaware
Donna Drew	Lancaster	Pennsylvania
Jane Drexler	Akron	Ohio
Rose du Plessis	Reno	Nevada
H Dubuisson	Denver	Colorado
Laurie Duke	Chicago	Illinois
Shawn Duke	Los Feliz	California
Heather Duncan	Los Angeles	California
James Duncan	Coloma	Michigan
Elizabeth Dunham	Miami	Florida
Lynn Dunn	Mount Arlington	New Jersey
Crystal Durham	Delta	Florida
Marc Durham	Reidsville	North Carolina
Josef Dustin Tracy	Reidsville	North Carolina
debra dworaczak	Cambridge	Massachusetts
Holly Dyer	Nevada City	California
E. Dyer	Troy	Michigan
Mark Dyer	San Francisco	California
Torchee Dyer	Hauppague	New York
Peggy E. Corder	Ladson	South Carolina
Burnis E. (Gene) Tuck	Tyler	Texas
Harold E. Robinson	Fresno	California
Gloria E. Sapia-Bosch	Talladega	Alabama
Iris E. Pierce	Falls Church	Virginia
Roberta E. Dempsey	Ramona	California
Ryan Eakin	Novi	Michigan
Julia Earl	Thurmont	Maryland
Chandra Easton	Atlanta	Georgia
Sarah Eberhardt	Santa Barbara	California
	Chester	New Jersey

Name	City	State/Country
Nanette Echols	St. Paul	Minnesota
Dave Eckelkamp	New Haven	Missouri
Michelle Edgcomb	Melbourne	Florida
Scott Edmondson	San Francisco	California
Carol Edwards	Woodland Park	Colorado
Dave Edwards	Olmsted falls	Ohio
Matt Eggers	Menlo Park	California
Tracey Ekker	Coronado	California
Jannet Elaine Hudson	Ehrhardt	South Carolina
John Elder	Woodland Hills	California
Betty Elkin	Glenview	Illinois
Perrin Elkind	Oakland	California
Mary Ellen Brody	Oakland	California
Laura Ellenwood	Montpelier	Vermont
Jeanette Elliott	Columbus	Georgia
Zenda Elshere	Garden City	South Carolina
Beth Emberton	Branson	Missouri
Irucka Embry	Knoxville	Tennessee
Obiora Embry	Knoxville	Tennessee
Brenda Emerich	Temple	Pennsylvania
Marilyn Engelman	Coram	New York
Kate Englund	Chicago	Illinois
Raymond Ensing	San Luis Obispo	California
Tom Entwistle	Santa Barbara	California
Arlene Epperson	La Crosse	Florida
Senka Enkson	Victoria	Canada
Patricia Ernest	Port St. Lucie	Florida
Steven Ertel	Lawrenceville	New Jersey
David Erwin	Valparaiso	Indiana
Susan Espey	Rio Linda	California
Arthur Espinoza	Denver	Colorado
Danielle Esposito	Brooklyn	New York
Ann Estep	Cupertino	California
Daniel Estermann	London	United Kingdom
Douglas Estes	San Francisco	California
Gregory Esteve	Lake Wales	Florida
William Estrada	Chicago	Illinois
D Eugene Wedge	Oak Park	California
Renee Euler	Oak Park	Illinois
V Evan	Chicago	Illinois
Karen Evans	Largo	Florida
Dinda Evans	San Diego	California
Luke Evans	Kent	United Kingdom
Patricia Evans	Las Vegas	Nevada
Carter Everett	Winter Park	Florida
Walker Everette	Twp of Washington	New Jersey
Kathy Evilsizer	Crystal River	Florida
Susan Evilsizer	Elyria	Ohio
Robert Evilsizer	Crystal River	Florida
Lois Evron	Cedarhurst	New York
Cynthia Faist	Irvine	California
Pete Falca	Jersey	New Jersey
Janet Falcone	Goffstown	New Hampshire
Shari Falomir	D.F	Mexico
Nicolas Fancher	Deltona	Florida
Lizbeth Farias	Miami	Florida
Jeffrey Farland	Westport	Massachusetts
Erin Farlow	Auburn	Indiana
Robin Faucher-Osborne	Paso Robles	California
Gina Fedon	Olathe	Kansas
Marsha Feimster	Greenville	South Carolina
Janet Feldman	Barrington	Rhode Island
Valerie Fenske Howard	Clarksville	Tennessee
Laura Ferejohn	Irvine	California
M Ferguson	Greenwood Village	Colorado
Joanne Ferguson	Spotsylvania	Virginia
Charles Ferrante	Miami	Florida
Robert Ferrari	Eastham	Massachusetts
Alyssa Ferry	Chêne-Bougeries	Switzerland
Daniel Fewster	Baltimore	Maryland
Anastasia Fiandaca	San Francisco	California
Kelly Fielden	Owings Mills	Maryland
Victoria Filinuk	Browns Mills	New Jersey
Jeremy Fink	Keene	New Hampshire
Ethan Finkelstein	Thorofare	New Jersey
Sigmund Finman	Canonsburg	Pennsylvania
Anne Firestone	Oxford	Indiana
Sonja Firing	Renton	Washington
Bob Fischella	Tucson	Arizona
Laura Fischer	New York City	New York
Roz Fischer	Beltsville	Maryland
Samantha Fish	Commack	New York
Douglas Fisher	Santa Barbara	California
Keith Fisher	Ardley	Pennsylvania
Mary Fisher	Bluffton	Indiana
Annie Fitch	Lindsay	Oklahoma
Arthur Fitzgerald	North Bergen	New Jersey
Peter Flack	W. Babylon	New York
Gail Flanagan	Augusta	Georgia
Eileen Flanagan	Pt. St. Lucie	Florida
Silke Fleischer	Sykesville	Maryland
Glenn Fleischman	Bronx	New York
Richard Fletcher	San Diego	California
Thelma Fligel	Massapequa Park	New York
Douglas Flint	Denver	Colorado
Lynda Flood	Brooklyn	New York
Alfredo Flores	Hempstead	New York
Patricia Flores	Trenton	New Jersey
Rick Flory	Jackson	Wyoming
Flo Flowing	Fairfield	California
Erin Flynn	Woodland Hills	California
Robert Focht	Union City	New Jersey
Grant Foerster	Kensington	California
Bill Foley	Denver	Colorado
Gloria Forbes	Rochester	New York
Doreen Forbes	London	Delaware
Garry Ford	McConnellsburg	Pennsylvania
Michael Ford & Richard Marks	Watsonville	California
Chad Fordham	Traverse City	Michigan
Tyler Forman	Phoenix	Arizona
Jennifer Forrest	Teaneck	New Jersey
Michael Forte	Palos Verdes	California
Mike Fortune	Brevard	North Carolina
Matthew Foss	Palmer	Massachusetts
Mark Foy	Berkeley	California

Name	City	State/Country
Andrea Fraley	New York	New York
Lawrence Frank	Atlanta	Georgia
Mark Fraser	Arlington	Texas
Wendy Frederick	Brandon	Vermont
Misha Fredericks	Millbrook	New York
Curtis Freeman	Kent	Washington
Carrie Friedenberg	Bethpage	New York
Anthony Friend	Carpinteria	California
Jeff Frontz	Columbus	Ohio
Randy Fuehrer	San Diego	California
Gary Fulford	Tulsa	Oklahoma
Stephen Fuller	Norfolk	Virginia
ann g. johnson	new albany	Indiana
Michelle Gaines	Cassatt	South Carolina
Ronald Galbavy	Agoura Hills	California
Anita Gale	Covington	Kentucky
Deanna Gallimore	Las Vegas	Nevada
Cecilia Galup	crawfordville	Florida
Jeff Gammon	Oakland	California
Karen Garber	Arlington	Massachusetts
Paul Garber	Berkeley	California
Jose Garcia	Los Angeles	California
Markus Gärdback	Varberg	Sweden
Mike Garnett	Tallahassee	Florida
David Garrett	Islamorada	Florida
John Garrick	St Albans	United Kingdom
Courtney Gartin	San Jose	California
Tina Gaston	N. Fond Du Lac	Wisconsin
Nancy Gathing	Madison	Wisconsin
Sheryl Gaudette	Hudson	New Hampshire
Jo Gauthier	Evansville	Indiana
Cindy Gawne	Gladstone	Michigan
Jamia Geer	North Las Vegas	Nevada
Craig Geiger	San Diego	California
Yehuda Gelb	Rochester	New York
Michael Gellineau	Holyoke	Massachusetts
Robert Gendron	Winchester	Virginia
Greg Gentry	Ruckersville	Virginia
John Gentry	Cincinnati	Ohio
Christy George	Williamstown	Kentucky
Pandora George	Manchester	Missouri
Debra Gerheart	Decatur	Illinois
Jill Gershen	Germantown	Maryland
Kate Gervits	Bronx	New York
Caroline Getz	Hollywood	Florida
Debbie Gibbs-Halm	Grand Blanc	Michigan
Jill Gibson	Oakland	California
Lee Gibson	Dallas	Texas
Monique Gilbert	Miami	Florida
Eren Giles	Austin	Texas
Mary Gill	Arcata	California
Greg Gill	Jonesboro	Georgia
Michael Gill	Oxford	Ohio
David Gillanders	State university	Arkansas
Janette Gilleen	Zeeland	Michigan
Donna Gilliam	Fresno	California
Pearl Gilman	Seattle	Washington
Richard Gilman	Kalamazoo	Michigan
Martha Gilmore	Carmichael	California
John Giordano	Deerfield Beach	Florida
Greg Giorgetti	Oakley	California
Gail Gilitz	Tellico Plains	Tennessee
Jacob Givens	Alexandria	Virginia
Laurie Glaser	Saint Paul	Minnesota
Linda Glasier	Olympia	Washington
Sarah Glass	Highland	Indiana
Berno Gliemann	Varel	Germany
Katie Glodzik	Kempton	Pennsylvania
Marcia Glover	Bellevue	Washington
Sasha Goders	Edmonton	Canada
Clary Goedert-Gasper	Renton	Washington
Laura Goldblatt	Princeton	New Jersey
Davina Golden	North Canton	Ohio
Lori Golden	Los Angeles	California
Chris Goldstandt	Newberg	Oregon
Eduardo Gomez	Rancho Cucamonga	California
Leonor Gonçalves	Porto	Portugal
Robert Gonzales	Clayton	New Jersey
Michelle Gonzales	West Islip	New York
Barbara Goodman-Fischtrom	Minnetonka	Minnesota
Morgen Goodroe	Dallas	Texas
Alan Goodson	Los Angeles	California
Patty Goon	Hudson	Massachusetts
Joan Gordon	Santa Barbara	California
Lewis Gorman III	Cherry Hill	New Jersey
David Gougler	Santa Rosa	California
Jason Gracia	Santa Rosa	California
María Graciela Ceballos Ruiz	México	Mexico
Jeannie Graham	Del Mar	California
Kimberley Graham	Coronado	California
Luke Grannis	Playa del Rey	California
Andrew Grant	Madison	Wisconsin
Theresa Gratis	Buzzards Bay	Massachusetts
Scott Gray	Winnipeg	Canada
Rhyan Grech	Pittsfield	Massachusetts
Mike Green	Memphis	Tennessee
Peggy Green	Margate	Florida
M Green		Missouri
Sean Greenwald	College Station	Texas
Duncan Gregory	Olney	Maryland
Andrea Greiling	Flagstaff	Arizona
Susan Grenewald	Fernandina Beach	Florida
Eleanor Grewal	Middletown	Delaware
Ann Grewal	Middletown	Delaware
Tom Grier	Albuquerque	New Mexico
Jenna Griffin	Springboro	Ohio
Kerrin Griffith	New York	New York
David Grimesey	Sioux City	Iowa
Cody Grimm	San Francisco	California
Elizabeth Grimwade	Chicago	Illinois
Sandra Griz	Mableton	Georgia
Richard Groshong	Columbus	Ohio
Ravi Grover	Chicago	Illinois

Name	City	State/Country
Ronald Grubb	Rockford	Illinois
Jessica Guidry	Duson	Louisiana
Amy Guidry	Opelousas	Louisiana
Raena Guillotte	Exeter	Rhode Island
Laura Gully	Reno	Nevada
Janine Gunderman	Sleepy Hollow	New York
Darryl Gunderson	San Buena Ventura	California
Lori Gunnell	Pasadena	California
MBeth Gunner	La Mesa	California
Jaclyn Gurule	Grants Pass	Oregon
Robin Gustus	Jacksonville	Florida
Diane Gutierrez	Cape Coral	Florida
James H. Reynolds III	Independence	Missouri
John H. Taylor	Wilmington	Delaware
Philip H. Coe	Wimberley	Texas
Stacy Haag	Sarasota	Florida
Antonia Haber	Miami	Florida
Matthew Habich	Austin	Texas
Patricia Hackemack	Kensington	California
Jen Hadraba	Naperville	Illinois
Sarah Hafer	Rio Rancho	New Mexico
Richard Hagen	Brooklyn	New York
Gayle Hales	Charlotte	North Carolina
Eva Haley	Tallahassee	Florida
Wayne Hall	Gilbert	Arizona
Jim Hamilton	Northridge	California
Christine Han	New York	New York
Holly Hancock von Guilleaume	Tucson	Arizona
Sarah Hanka	Sarasota	Florida
Kelly Hanlon	Mountain Top	Pennsylvania
Laurie Hansen	Walnut Grove	Minnesota
John Hanson	Leland	Illinois
Art Hanson	Lansing	Michigan
Kristin Hanson	Anchorage	Alaska
Rita Harahap	Jakarta Utara	Indonesia
Clint Harder	Madison	Wisconsin
Dian Hardison	Cocoa	Florida
Mark Hargraves	Oakland	California
Lana Hargreaves	Kenedy	Texas
Andrea Harris	Mount Laurel	New Jersey
Christopher Harrison	Waikoloa	Hawaii
Daintre Hart	Brooklyn	New York
Karryn Hart	DeGraff	Ohio
Emily Hart	Meadow Vista	California
Randy Hartwig	West Des Moines	Iowa
Joseph Harty	Santa Rosa	California
Joan Harvey	Santa Barbara	California
Allan Haseltine	Putnam	Connecticut
Joe Haslett	Catskill	New York
Marjorie Hass	Hartshorne	Oklahoma
Christi Hatcher	New York	New York
Daniel Hatfield	Portland	Oregon
Melissa Hatfield	Santa Monica	California
Bonnie Haufe	Williamsburg	Virginia
Keir Haug	Saint Louis	Missouri
Lisa Haugen	Kearney	Missouri
Paula Haughney	Old Bridge	New Jersey
Corwin Haught	Grand Forks AFB	North Dakota
Alex Hawley	Doylstown	Pennsylvania
Norma Hay	Boca Raton	Florida
Marguerite Hayde	Brooklyn	New York
Amber Hayden	N. Haverhill	New Hampshire
Sara Hayes	Long Beach	California
Lori Hayes	CONCORD	North Carolina
Lisa Hayes	Peoria	Illinois
David Haymon	Brockport	New York
Brian Haynes	Oshkosh	Wisconsin
Barbara Hayward	Honolulu	Hawaii
Thomas Headrick	Redford	Michigan
Dr. Healy Hamilton	Berkeley	California
Chris Heaney	Chapel Hill	North Carolina
Sarah Heaney	Anglesey	United Kingdom
Richard Heaning	No Massapequa	New York
Russell Heath	Steuben	Maine
John Heaton	Kirksville	Missouri
Nick Hedlund	Portland	Oregon
Grace Heicher	University Park	Pennsylvania
Melina Heiley	New York	New York
Jeanette Heinrichs	Pittsburgh	Pennsylvania
Mary Helen Pederson	Cathlamet	Washington
Karen Hendershot	Poway	California
Jane Henderson	Flourtown	Pennsylvania
Doree Henderson	Incline Village	Nevada
Laura Henderson	Michigan City	Indiana
Viviana Henriques	Lisboa	Portugal
Colleen Henry	Pitman	New Jersey
Tracy Hensley	West Chester	Ohio
Jaxie Heppner	Beebe	Arkansas
Dr. Herbert Vaughan	Stamford	Connecticut
Sam Hergenrath	Sebastopol	California
Olga Hernandez	Baldwin Park	California
Elizabeth Hernandez	Union City	New Jersey
Lynda Hernandez	Huntington Beach	California
Lenora Hernandez-McKee	Bumpass	Virginia
tomas herndon	tucson	Arizona
Martha Herrero	Morton	Texas
Stephen Herrington	Eldorado Springs	Colorado
Jeanette Hess	Slingerlands	New York
John Hetts	University City	Missouri
Elyse Heyman	Monroeville	Pennsylvania
Nikki Hietala	Superior	Wisconsin
Rose Hilbert	Milwaukee	Wisconsin
Patricia Hill	Annandale	Minnesota
Melissa Hill	Irvine	California
Dr. Hillel Lazarus	Panorama City	California
Blaine Hilton	Portage	Indiana
Karen Hinderstein	Margaretville	New York
Maxine Hirschel	Boynton Beach	Florida
Larz Hitchcock	Madison	Wisconsin
Charlene Hoag	New Port Richey	Florida
Lisa Hobson-Webb	Winston-Salem	North Carolina
Lisa Hoch	Superior	Wisconsin
Travis Hodges	Mattawan	Michigan
Tash Hodges	Fayetteville	Ohio
L Hoefflich	Chicago	Illinois

Name	City	State/Country
Eileen Hoenig	Paradise	California
Michael Hoffberg	Wayne	Pennsylvania
Farah Hoffman	Indianapolis	Indiana
Carol Hoffman	Fort Lauderdale	Florida
Kim Hoffman	Portland	Oregon
Paul Hofheins	Toanwanda	New York
Shana Holberton	Oakland	California
Bob Holder	Mt Sinai	New York
Heldi Holman	Norman	Oklahoma
Tom Holford	Leadville	Colorado
Deanna Holland	Toronto	Canada
James Holley	Santa Cruz	California
Alyson Holliday	Tuscaloosa	Alabama
Alicia Hollinger	Los Angeles	California
Denise Holloway	Fayetteville	West Virginia
Ginny Holm	Gresham	Oregon
Jessica Holt	Boulder	Colorado
Lynne Holt	Lake Forest	California
Regina Holt	Elkridge	Maryland
Barb Holtz	NY	New York
Beverly Hood	Juda	Wisconsin
Triska Hoover	Silver Spring	Maryland
Zoe Hope	Queensland	Australia
Helen Horine	Golden	Colorado
Judith Hornady	Mobile	Alabama
Aileen Horowitz	Morton Grove	Illinois
Abigail Horro	Alicante	Spain
Melanie Horrocks	Fort Leonard Wood	Missouri
Harriet Horton	Saginaw	Texas
Richard Hoskins	Olympia	Washington
Stanley Hosterman	Cleveland	Ohio
Jason Hotchkiss	Austin	Texas
C Hough	Council Bluffs	Iowa
Nancy Houghton	Nevis	Minnesota
Keith Houser	Bellevue	Washington
Dean Houser	Monroe	Michigan
Brad Houseworth	St. Joseph	Michigan
Erika Hovater	North Las Vegas	Nevada
Brian Howard	Orange	Connecticut
laura howe	los angeles	California
Susan Howe	Oceano	California
Athena Hsieh	St. Louis	Missouri
D.P.H. Huang	Andover	Massachusetts
Juliet Hubbard	Flushing	New York
PJ Hubbard	Towson	Maryland
Raymie Huerta	Rochester	Minnesota
Courtney Huggins	Chula Vista	California
Marjorie Hughes	Bexley	Ohio
Azul Hull	White Plains	New York
Michelle Hummer	San Leandro	California
Jane Humphrey	Annville	Pennsylvania
Heldi Hunt	St. Louis	Missouri
Jennifer Hunter	Rockport	Maine
Marian Huq	Jewett	New York
Debbie Hurwitz	Voorhees	New Jersey
Tom Hutchins	pleasantville	New York
Shane Hutte	Santa Rosa	California
Donna Hyde	Indianapolis	Indiana
Michael Hyde	Paragould	Arkansas
Edeliza I. Quevedo	San Francisco	California
Claire Ianno	Sweetwater	Florida
Megan Ihrig	New York	New York
Lillian Ingster	Ridgeway	Canada
Emil Ippolito	Great Falls	Virginia
Francisco Iriarte	Chatham	New Jersey
Mustafa Isilak	Pompton Plains	New Jersey
Kay Izlar	Istanbul	Turkey
Gerald J Dalton	Aracata	California
Mark J Burwinkel	Naperville	Illinois
Alan J. Frumkin	Cincinnati	Ohio
Denise J. Tartaglia	Houston	Texas
Catherine J. Circo	Houston	Texas
Alan Jackson	New York	New York
Carolee Jackson	Glendale	California
Tom Jackson	Uniondale	New York
Susan Jackson	Oceanside	California
Jim Jacobs	denver	Colorado
Sandie Jacobs	Farmington	New Mexico
Paul Jacobson	Cincinnati	Ohio
Denis Jahne	Pittsburgh	Pennsylvania
Behroze Jaikaria	Idyllwild	California
G James Jr	Appleton	Wisconsin
Mary Jane Wright	Lawrenceville	New Jersey
Mary Jane Nolan	Killeen	Texas
Karen Jarrell	Longmont	Colorado
Robin Jatko	Pittsburgh	Pennsylvania
Peggy Javellana	Fowler	Indiana
Jenny Jay	Brooklyn	New York
Betty Jean Herner	Apopka	Florida
Tracy Jenkins	Somerville	Massachusetts
Melodi Jenkins	Strongsville	Ohio
Mark Jenkins	Lake Stevens	Washington
Dr. Jeremy Hanna	Deltona	Florida
Paul Jersey	Deltona	Florida
Mary Jo Brinker	Auburn	Alabama
Bobbi Jo Chavarria	seattle	Washington
Mary Jo Knox	New Kensington	Pennsylvania
Elizabeth Johnson	Fontana	California
William John Divney	Pittsburgh	Pennsylvania
Michael John Mayo	Lake Hill	New York
Jaki Johnsen	New York	New York
Kate Johnson	San Francisco	California
Charlene Johnson	NY	New York
Carltiln Johnson	Annapolis	Maryland
Dedra Johnson	Goleta	California
Dan Johnson	Overland Park	Kansas
Jillian Johnson	New Orleans	Louisiana
Vicki Johnson	Monroe	Michigan
Emily Johnson	La Crescenta	California
Bettemae Johnson	Kansas City	Missouri
Lynda Johnson	San Rafae	California
Sandra Johnson	Beltton	Texas
	Portland	Oregon
	St. Cloud	Minnesota

Name	City	State/Country
Gregory Johnston	Decatur	Indiana
Kathy Johnston	Fairfield	California
Steve Johnston	Hollister	California
Michael Joines	Arlington	Texas
Isabelle Jolly	El Segundo	California
Robert Jonas	Westfield	New Jersey
Beth Jones	Monticello	Iowa
Cherie Jones	Bradenton	Florida
Miriam Jones	Mobile	Alabama
Megan Jones	Tuakau	New Zealand
JACKIE JONES	davis	Oklahoma
Jenna Jonteaux-McClay	Fox River Grove	Illinois
Kris Jordan	Reviewview	Michigan
Laura Jordan	Albion	Michigan
Lawrence Joseph	Haslett	Michigan
Barbara Julien	Kent City	Michigan
Roberta K Wright	Alameda	California
J. K. Fort-Strietzel	Meadowlands	Minnesota
Julie K. Coultres	Guthrie	Oklahoma
Judith Kahle	Fairfield	California
Kristina Kaiser-Hipp	Oakmont	Pennsylvania
Kristen Kalakos	Pittsburgh	Pennsylvania
Ed Kanczewski	Pompton Plains	New Jersey
Nina Kanga	Sun Valley	California
Sidney Kantor	Monroe Twp	New Jersey
Jessica Kaplan	Alexandria	Virginia
Sandra Karlsvik MD	Fox Island	Washington
David Karowe	Kalamazoo	Michigan
E. Karsten Smelser	Minneapolis	Minnesota
Marian Kart	Delray Beach	Florida
Annina Kaski	espo	Finland
JD Kaspar	St. Charles	Illinois
Linda Kate Beswik	London	Great Britain
Mary Kate Frank	Lansdale	Pennsylvania
Alfred Katz	Old Tappan	New Jersey
Toshiya Kauffman-Smith	Lake Oswego	Oregon
Denise Kaufman	Chicago	Illinois
Murray Kaufman	Fair Lawn	New Jersey
Robin Kaufman	San Francisco	California
Michael Kavanaugh Jr	Palmyra	Virginia
Marshall Kavanaugh	Ewing	New Jersey
Elizabeth Keating	Dallas	Pennsylvania
Bill Kedem	San Francisco	California
Nina Keefer	Platteville	Colorado
Dorothy Keeler	Anchorage	Alaska
Laura Kefauver	San Antonio	Texas
Suzanne Kehr	Oxford	Ohio
Joanne Kelly	Monterey	California
Wayne Kelly	Ashland	Oregon
Melissa Kelly	Merced	California
Matt Kelly	New Ashford	Massachusetts
Katharina Kempf	Annandale-on-Hudson	New York
Jeffrey Kempster	Iexington	Kentucky
Katrina Kendall	San Clemente	California
Roman Kernitski	Colonia	New Jersey
Lauri Kero	Tampere	Finland
Raymond Kervahn	Saint Petersburg	Florida
Laura Kessler	Kent	Ohio
Lori Ketterlin	Redmond	Washington
Elizabeth Key	Leicester	North Carolina
Jenn Khufash	Long Beach	California
Kathryn Kielbasa	Annerley	Australia
C. Kim Grant	Tallahassee	Florida
Anthony Kimmons	Houston	Texas
Jeanette King	Livermore	California
Ashley King	Richmond	Virginia
Lilo Kinne	Weehawken	New Jersey
Michael Kirby	Northfield	Minnesota
Margaret Kirk Pedroza	Pflugerville	Texas
Chris Kirker	Eldersburg	Maryland
Kathy Kirkland	Key West	Florida
Randy Kirkpatrick	Oswego	Kansas
Melody KirkWagner	Bellevue	Washington
Lark Kirkwood	Oklahoma City	Oklahoma
Irene Kitzman	Hamden	Connecticut
Colleen Kjems	Neptune City	New Jersey
Pamela Kjono	Grand Forks	North Dakota
Sara Kleinbaum	Hackensack	New Jersey
Sheri Klingensmith	Fairfax	Virginia
Michael Kloor	Ashland	Oregon
Klara Kmetovich	Dubrovnik	Croatia (Hrvatska)
Ingrid Kneller	Hythe	United Kingdom
Tom Knepher	Los Osos	California
Jason Knight	Edinburgh	United Kingdom
Phill Knight	Lomita	California
Mae Knight	Park Forest	Illinois
Linda Knoll	Royal Palm Beach	Florida
Gregory Koch	Anaheim	California
Richard Kociban	West Mifflin	Pennsylvania
Ellen Kohjima	Auburn	Washington
John Kohler	Daly City	California
Deborah Koken	Costa Mesa	CA
Brittany Kolyznyk	Upland	California
Melanie Konrad	Sand Lake	Michigan
Angela Korpar	Henrietta	New York
Michael Korte	Brandon	Florida
Gary Kosman	Granada Hills	California
Melissa Koval	Dansville	Michigan
Kelly Kowalski	College Park	Maryland
Merrill Kramer	Halalandale	Florida
Jeff Krause	Hinsdale	Illinois
Greg Krennek	Oceanside	California
Adelheid Kresse	Graz	Austria
Dale Krewson	Lebanon	Oregon
Karin Kroh	Seattle	Washington
Amy Krueger	Darein Center	New York
Belle Krumholz	Thomasville	Georgia
Susan Kruthers	Palos Park	Illinois
Sara Kube	philadelphia	Pennsylvania
Dawn Kudish	Boca Raton	Florida
Jennifer Kugel	San Diego	California
Jeremy Kuhn	Grand Junction	Colorado
Noel Kumpf	everett	Washington
Sophia Kuo	Seattle	Washington
Kimberly Kurcab	Irvine	California

Name	City	State/Country
Janyis Kuznier	Vernon	New Jersey
Linda L. Wiley	Homer	New York
Gary L. Campbell	Conroe	Texas
Alice L. Logan	Pittsburgh	Pennsylvania
Pedro L. Sanabria	Riverdale	Georgia
Terry L. Stagman	Oak Park	Illinois
Joseph Labuda	Middletown	New York
Joshua Laif	Seattle	Washington
Stephenie LaFlesch	Missoula	Montana
Andy LaHaie	Muskegon	Michigan
Jesse Lamb	Crystal Springs	Mississippi
Cynthia Lamontagne	Los Angeles	California
Claudine Lampson	Galesburg	Illinois
Earl Lane	Hannibal	Missouri
DonLee Lane	Lakewood	Colorado
Samantha Lange	Hartly	Delaware
Nick Langill	Spokane	Washington
Brenda Lanning	Levittown	Pennsylvania
Scott Lanning	San Diego	California
Jeff Lapidis & Diane Sands	Sierra Madre	California
Kate Larsen	Oakland	California
Amy Larsen	Fullerton	California
Mary Larson-Edwards	Madrid	Iowa
Jacqueline Lasahn	Richmond	California
Frank Laschiazza	Cicero	Illinois
Monica Laura Creus Ureta	Buenos Aires	Argentina
Sharon Lavender	Broussard	Louisiana
Laurie Lavenhall	Fruitland Park	Florida
VM Lawrence	Bronx	New York
Sylvia Lawrence	Auburn	Washington
Thu Le	Brooklyn	New York
Alana Lea	Blaine	Washington
Kathleen Leavey	Somerville	Massachusetts
William Leblanc II	Biloxi	Mississippi
Joseph LeBoeuf	Whitinsville	Massachusetts
haidee leclair	berlin	Massachusetts
Tena LeDoux	Superior	Wisconsin
Sarah Lee	Blountsville	Alabama
Jack Lee	Dupo	Illinois
Kevin Lee	Maysville	West Virginia
Tucker Lee Bennett	San Francisco	California
S Leff	San Diego	California
Matthew Lehman	Chula Vista	California
Helen Lembeck	Topsham	Maine
Christine LeMieux	Orlando	Florida
Denise Lendway	Lincoln	Rhode Island
Donna Leonard	Quezon City	Philippines
Imelda Leros	Seattle	Washington
Nancy Lerner	Katy	Texas
Connie Lersch	Boynton Beach	Florida
Larry Lesser	Albuquerque	New Mexico
David Lester	Portsmouth	New Hampshire
Michael Letendre	Richardson	Texas
Stephen Levine	La Crescenta	California
Sandy Levine	New Hamburg	New York
Emily Levitt	Chandler	Arizona
Timothy Lewis	Lemoyn	Pennsylvania
Michael Lewis Donmoyer	Pittsfield	Massachusetts
Tom Lewis	Panama City	Florida
Geneva Lewis	Santa Monica	California
Jan Libby	Chesterfield	Missouri
Mollie Liberman	Huntington Beach	California
Kurt Lieber	Birmingham	Alabama
Jane Lightning	Tallahassee	Florida
Andrew Limburg	San Antonio	Texas
pamela lind	Austin	Texas
Bethany Linder	Seattle	Washington
Darian Lindle	Boca Raton	Florida
Jennifer Lindner	Stockholm	Sweden
Anna Lindstrand	Andover	Massachusetts
Robin Linn	New Franklin	New Hampshire
Donna Liois	Brooklyn	New York
Jennifer Liptow	Monroe Township	New Jersey
Kitrina Lisiewski	San Diego	California
Mario Listig	Sedona	Arizona
Tina Littleman	Wheeling	Illinois
Patsy Livingston	San Francisco	California
Richard Livingston	Hamilton	Canada
Nora Livingstone	Allston	Massachusetts
Alexander Lobkovsky	Romeoville	Illinois
Sara Loboda	Columbus	Georgia
Joanie Locie	Hayward	California
Charlene Locke	Arlington	Virginia
Sandra Lockhart	Niecy LoCricchio	Colorado
Niecy LoCricchio	Los Gatos	California
Otto Loenneker	Ooltewah	Tennessee
Thomas Logan	Grinnell	Iowa
Caroline Logan	Kearny	New Jersey
Richard Long	Rochester	New York
Joseph Longo	Tyone	New Mexico
Sharon Looking Woman	Westminster	Colorado
Angela Lopez	Bakersfield	California
Lonnie Lopez	Mechainsburg	Pennsylvania
Randi Lorah	Bonney Lake	Washington
Dian Lord	Miami	Florida
Mary Lou Grolimond-Olson	Big Bear Lake	California
Robert Loucks	Leesburg	Virginia
Amy Lourenco	San Diego	California
Jacquie Lowell	San Francisco	California
Indra Lowenstein	Bismarck	North Dakota
Shelley Lubens	Merrick	New York
Jennifer Lubinsky	Statesboro	Georgia
Leann Luckett	Roswell	Georgia
Gary Ludi	Chicago	Illinois
Miranda Lukatch	Alpine	California
Jim Lunsford	Tilton	New Hampshire
Valerie Lurie	Lanesborough	Massachusetts
Tom Lusignan	Brighton	Massachusetts
Danielle Lutzenberg	FRANKLIN	New York
Rev. Lyle D. Linder	Garland	Texas
Micki Lyn Szabo	Brunswick	Maine
Janet Lynch	Nashua	New Hampshire
Gail Lynch		

Name	City	State/Country
Rose Lynd	Bronxville	New York
andy lynn	douglasville	Georgia
Cynthia Lynn	Palmer	Michigan
Terri Lynn Boehler	Halifax, Nova Scotia	Canada
J. Lynn Munding	Mission Woods	Kansas
Malika Lyon	Lawrence	Kansas
Anthony Lyons	Lamar	Missouri
James M Nordlund	Lakin	Kansas
James M Nordlund	Lakin	Kansas
Airton M. Junior	Porto Alegre	Brazil
Sue M. Watkins	Fulton	Mississippi
Amanda M. Lynn	Mountain View	California
Elizabeth Mac Dougall	San Diego	California
Nicole Macaluso	Rancho Santa Fe	California
June MacArthur	Santa Rosa	California
George Macaulay	Hillsboro	Oregon
Orion Macdonald	Wellfleet	Massachusetts
Doug Macdonald	Sheffield	Massachusetts
Taylor MacDonald	Philadelphia	Pennsylvania
Sharon MacDonald	Medford	Oregon
Andrew Macginitie	Roxbury	Connecticut
Frederick Mackey	Denver	Colorado
Donna Macro	Auburn	New York
Robert MacVittie	Williamsville	New York
Neahle Madden,RN	Santa Rosa	California
Rohit Mahajan	Bloomfield Hills	Michigan
Herushia Maharaj	Waltham	Massachusetts
Rebecca Main	London	United Kingdom
Marjo Maisterra	Los Angeles	California
Lennie Major	Mounds View	Minnesota
Lorri Makela	Port Richey	Florida
Mark Mallchok	Evanston	Illinois
Tracy Mallozzi	Los Angeles	California
Ward Mamlok Jr	San Jose	California
Denise Maney	Madison	Wisconsin
Judi Mangan	Pittsburgh	Pennsylvania
Michelle Mangio	East Weymouth	Massachusetts
Bridget Manley	Los Angeles	California
Heather Manlove	Oakhurst	California
Robert Manning	Johnsburg	New York
Dale Manning	Syracuse	New York
Veronica Manthei	Hewitt	New Jersey
Heidi Marcoux	Manchester	Connecticut
Theodore Marenberg	Lanoka Harbor	New Jersey
Rebecca Margiotta	Madison	Wisconsin
Coleen Marie Lyon	Denver	Colorado
Justin Marino	Poland	Ohio
Marie Mark	Santa Barbara	California
John Mark Robertson	Toronto	Canada
S Markell	Costa Mesa	California
Alec Marken	Lake Forest	California
Susan Marone	Forney	Texas
Susan Marsch	Lewisberry	Pennsylvania
Lisa Marshall	Houston	Texas
Kristin Marshall	Keyport	Washington
Deena Martin	Redondo Beach	California
Ann Martin	Santa Barbara	California
Adele Martin	Redondo Beach	California
Michele Martin	McDonough	Georgia
Heather Martin	Jonesboro	Georgia
Cassidy Martinez	Portland	Oregon
Maria Martinez	Port Hueneme	California
Kim Martinez	Pendleton	South Carolina
Rosemarie Martorana	Long Island City	New York
Connie Mason	Chattanooga	Tennessee
Gloria Mason-Gidcumb	Ferrum	Virginia
Emily Massarotti	Richfield Spa	New York
Roger Massey	Golden	Colorado
Rosemary Massie	Waverly	Ohio
Julien Massol	Shanghai	China
Patricia Mast	Tallahassee	Florida
Jamie Masterson	Glenside	Pennsylvania
Rik Masterson	portland	Oregon
Danielle Masterson	Voorheesville	New York
Mary Mathews	Lake Forest	Illinois
Erik Mathews	Denver	Colorado
M. Mathewson	Culver City	California
Julie Mathis	Tarpon Springs	Florida
Peter Matteson	El Cerrito	California
Abby Maxwell	Durham	North Carolina
Erin Mayberry	San Diego	California
Karen Mayer	Dallas	Texas
Marilyn Mayers	New York	New York
Joan Mazur	Brook Park	Ohio
Robert Mc Tigue	Southport	North Carolina
Tamaro McAfee	Okeechobee	Florida
Kelley McAnally	Fort Worth	Texas
Stephanie McAsk	Rochester	Michigan
William McCaffrey	Orlando	Florida
Kathy McCann	Milton	Wisconsin
Tom McCarter	Palo Alto	California
Peggy McCarthy	Eastlake	Ohio
Cathy McCartney	Montclair	New Jersey
Jennifer McClure-Gast	Durango	Colorado
Kim McCoy	Worcester	Massachusetts
Gish McCracken	Cowpens	South Carolina
Shawn McCracken	Kernah	Texas
Kris McCradic	Salt Lake City	Utah
Quincy McCray	Vallejo	California
Jen McCreary	Glen Burnie	Maryland
Col McDonald	miami	Florida
Janet McDonald	Stone Mountain	Georgia
Esther McDowell	Benton	Arkansas
Michael McFarland	Fresno	California
Lee McFarlane	Coventry	United Kingdom
Brian Mcgee	springvalley	Ohio
Aaron McGee	Madison	Wisconsin
Kellie McGettigan	Winfield	West Virginia
Gaye McGill	St Peters	Missouri
Mary McGilligan	Duluth	Minnesota
Michael McGirr	Tampa	Florida
Amy McGonagle	Burlingame	California
Julia McGovern	Waimea	Hawaii
Patty McGrath	Potomac	Maryland
Brad Mcgregor	Whistler	Canada

Name	City	State/Country
Sina McGriff	Trabuco Canyon	California
Matthew McGuire	Cheshire	Connecticut
Mary-Helena McInerney	Malden	Massachusetts
Eleanor McIntyre	Florissant	Missouri
Kelly McKee	Woodland Hills	California
Miles McKenzie	Sebastopol	California
Shoshannah McKnight	Santa Cruz	California
Eric McLearn	East Lansing	Michigan
Amanda McNeese	Leander	Texas
Catherine McNeff	Fort Townsend	Washington
Michele McRae	Fort Worth	Texas
Michael McSwiggin	Santa Cruz	California
Erin Mcvoy	Denver	Colorado
Laura Mears	Swansea	United Kingdom
Livia Medda	Cagliari	Italy
Kathleen Medina	Anacortes	Washington
Alison Megger	Tinley Park	Illinois
S Mehra	Auckland	New Zealand
Laura Meinhardt	Greensboro	North Carolina
Martin Meisner	Lake Forest	California
Andre Meister	London	United Kingdom
Dennis Meizys	Columbia	Maryland
Dr. Melissa Hillman	Albany	California
Kathryn Melton	Atwood	Indiana
Terri Memeo	San Jose	California
Vince Mendieta	Austin	Texas
Barbara Mercaldo	Conroe	Texas
Jeffrey Mercer	Albany	New York
Robert Meredith	Corvallis	Oregon
Eda Meredith	Studio City	California
Loren Merrill	Dayton	Maine
Deb Merrill	Menlo Park	California
Isabel Muelero	West Miami	Florida
Sheila Messer	Huntington	Massachusetts
Kelly Messimer	Mansfield	Ohio
Juneann Messina	Middle Island	New York
Marie Messzaros	Broadview Heights	Ohio
Steve Metcalf	Rockbridge	Rhode Island
Dawn Mettler	New York	Ohio
Gordon Metz	New York	New York
Emily Metz	New York	New York
Diane Meyer Simon	Metcito	California
Victorine Meyers	Covington	Kentucky
R. Michael McLellan	altoona	Pennsylvania
Adine Michaels	san francisco	California
Courtney Michelle	Longmont	Colorado
Suzanne Miles	Tenino	Washington
Meg Miles	jackson	New Hampshire
kathy miller	brownsville	Oregon
Doug Miller	Hamilton	New York
Judith Miller	Pasadena	California
M Miller	Spring	Texas
Kristie Miller	Kalamazoo	Michigan
Naomi Miller	Westmont	Illinois
Rosanna Miller	Venice	Florida
Sarah Miller-Kramer	Rochester	New York
Sara Millhouse	Galena	Illinois
Matthew Mims	Monroe	Connecticut
Brian Miner	West Allis	Wisconsin
August Mirabella	North Wales	Pennsylvania
DaniLe Miramontes-johnson	Viking	Minnesota
Denicolai Miranda	Simiane-Collongue	France
Michael Mirigian	Fresno	California
Amy Mitchell	Rindge	New Hampshire
Robert Mizar	Haleiwa	Hawaii
Jake Moav	Reshon	Israel
Jacqueline Mohan	Hillsborough	North Carolina
Susan Molloy	Castro Valley	California
Michael Monahan	Franklin Square	New York
Lisa Mondra	Placitas	New Mexico
Peter Monopoli	Plymouth	Massachusetts
T. Monroe	RSM	California
Katie Montanaro	Pickerington	Ohio
Juanita Montano	Waukegan	Illinois
Dianne Monteiro	Springfield	Virginia
Susan Montross	Astoria	New York
Susan Moody	Terre Haute	Indiana
Jackie moore	santa clara	California
Jim Moore	Bloomsbury	New Jersey
Alexandra Moore	Ann Arbor	Michigan
Vandy Moore	Afton	Oklahoma
Tammy Moore	Caesar	North Carolina
Sarah Moore	San Francisco	California
Rebecca Moore	New York	New York
Matt Moore	Miller Place	New York
Phyl Morello	Albrightsville	Pennsylvania
Bud Morello	Albrightsville	Pennsylvania
Elizabeth Moreno	Los Gatos	California
Diana Moreno-Alfonso	Fort Myers	Florida
Rachael Moretti	Novato	California
Tanya Morgan	Madison	Wisconsin
Sharon Morgenbesser	Framingham	Massachusetts
Jenni Morian	Arlington	Massachusetts
Krista Morin	Middleton	Massachusetts
Vira Moroz	Lakewood	Ohio
Lela Moroz	Lakewood	Ohio
Christopher Morray-Jones	Alameda	California
Marie Morris	West Hills	California
Francine Morris	Austin	Texas
Melissa Morris	Beaverton	Oregon
Colette Morrow	Oak Park	Illinois
Robert Morten	San Leandro	California
Sidney Moseley	Ashland	Oregon
Nick Mosiman	Lawton	Oklahoma
Tony Moss	Long Beach	California
Damita Moss	Lewisville	Texas
James Mosser	Pembroke Pines	Florida
Keli Motanagh	Creve Coeur	Missouri
Claudia Mottek	Reisterstown	Maryland
Lisa Moye	Goldsboro	North Carolina
Joe Moye	Tallahassee	Florida
Debbie Mrozinski	Buffalo	New York
Shirley Mullett	New Martinsville	West Virginia

Name	City	State/Country
Amy Mullin	Albuquerque	New Mexico
Bryan Mulvaney	Glendale	Arizona
Christina Muolio	Marlboro	New York
Andrew Murawa	Claremont	California
James Murphey	Fort Bragg	California
Barbara Murphy	Somers	New York
Judith Murphy	Albuquerque	New Mexico
Edward Musich	North Hollywood	California
Bruce Myers	Santa Rosa	California
Wayne Myers	Irvine	California
Jasmine Nacua	Keller	Texas
Joan Naeseth	Minneapolis	Minnesota
Rose Najia	San Rafael	California
Faith Nale	Duarte	California
BJ Narog	Fairview	North Carolina
Joseph Narvarte	Augusta	Georgia
Giovanni Natale	Santa Monica	California
Linda Naude'	Johannesburg	South Africa
Alan Nayer	Mill Valley	California
Amber Neal	Tully	New York
Victoria Nee	Chicago	Illinois
Merle Neidell	St. James	New York
Denise Nelms	Balch Springs	Texas
Devon Nelsen-Maher	Camarillo	California
Ramona Nelson	Pompano	Florida
Chris Nelson	Eagle Mountain	Utah
Kass Nesbitt	Moravia	New York
Emelia Nevers	Shoreline	Washington
Mark Neville	Morristown	Tennessee
Paula Newman	Covina	California
Marah Newman	La Jolla	California
Leone Newmark	Ft. Lauderdale	Florida
Joan Newton	Wells	Maine
Quyen Nguyen	San Diego	California
Trang Nguyen	North Quincy	Massachusetts
Zoe Nicholise	Minneapolis	Minnesota
Severine Nichols	Edmonds	Washington
Thomas Nicholson	Petaluma	California
Marysa Nicholson	East Setauket	New York
Emma Nickelson	Port Arthur	Texas
Matthew Niednagel	Flemington	New Jersey
Megan Nix	Upland	California
Christine Noe de Luna	Orlando	Florida
Linda Nolte	San Diego	California
Carla Nordstrom	Phoenix	Arizona
Linda Norelli	Austin	Texas
Kathleen Norman	Richland	Missouri
Joan Northrop	Surry	New Hampshire
Carissa Norton	Sacramento	California
Melissa Novak	La Mesa	California
Kai Novotny	Duluth	Minnesota
Barbara Nye	Erie	Pennsylvania
Kathy O'Brien	Arma	Pennsylvania
Gerard O'Brien	Brea	California
Dorothy O'Connell	Fairplay	Colorado
Satu O'Connell	Allston	Massachusetts
Tom O'Leary	Tucson	Arizona
Christine O'Neil	Peoria	Illinois
Andrea O'Neill	Richmond	California
Christi Oates	Orlando	Florida
Patrick Obranovic	Arnold	Missouri
Norma Obrian	sherwood park	Canada
Chris Obrien	Belchertown	Massachusetts
Laura Oesterhaus	Manhattan	Kansas
Doug Offield	Cottonwood	Arizona
Nanette Oggiono	Upton	Massachusetts
Mary Ogle	Cosby	Tennessee
Rochelle Ohman	Springfield	Oregon
Rita Oksanen		Finland
Sheryl Olejniczak	Auburndale	Florida
Gary Oliver	Abilene	Texas
Emmi Ollila	Jarvenpaa	Finland
Thomas Olmsted	State College	Pennsylvania
Jane Olson	Sidney	Montana
Kathleen Olszewski	Garfield Hts	Ohio
Katherine Oshana	Langhorne	Pennsylvania
Marie Osmundsen	Sunrise	Florida
Hob Osterlund	Honolulu	Hawaii
Aline Otero	Solebury	Pennsylvania
Angel Overgaard	Mosinee	Wisconsin
James Overstreet	Quincy	California
Dogan Ozkan	istanbul	Turkey
Letitia P Allman	Maple Shade	New Jersey
Aubrey P. Williams	Silver Spring	Maryland
Bernard P. Wojcik, Jr.	Otego	New York
Lorraine Pacheco	Millbrae	California
Patti Packer	Scotia	New York
April Pafford	Haiku	Hawaii
Carol Page	Somerville	Massachusetts
Devynne Pahio	Honokaa	Hawaii
Sarah Paige	Ojai	California
Paul Paine	Chiefland	Florida
Gregory Pais	Trout Run	Pennsylvania
Michelle Palacios Wimbish	Fairfax	Virginia
Bridget Palecek	Oshkosh	Wisconsin
Jan Paley	Los Angeles	California
Philip Palmer	Pasadena	California
Gina Palmer	Martins ferry	Ohio
Donna Panagakis	Mill Valley	California
Alyssa Panitch	Schenectady	New York
Kost Pankiwskyj	Haleiwa	Hawaii
Sophie Panossian	Mahwah	New Jersey
Jennifer Papenberg	New Hartford	New York
Maria Papi	Los Angeles	California
Cynthia Papia	Millbury	Massachusetts
Julie Parisi Kirby	Woodstock	New York
Gram Parker	Streamwood	Illinois
Cindy Parker, MD	Baltimore	Maryland
Cheryl Parker	Rockland	Maine
Kathalene Parker	Monrovia	California
Noreen Parks	Keauu	Hawaii
Diana Partington	Wrightwood	California
Christi Paschen	Niles	Illinois
Richard Pasichnyk	Tempe	Arizona
avani patel	fontana	California

Name	City	State/Country
Christiane Patels	Lake Mary	Florida
Christine Paterson	Milton Keynes	Great Britain
Dianne Patterson	Sonoma	California
Diane Patton	Thousand Oaks	California
Santonu paul	cambridge	Massachusetts
Sean Paul	Cambridge	Massachusetts
Kim Paul	Coventry	Rhode Island
Lauren Paul	Houston	Texas
Richard Paul	Provo	Utah
Mark Paulino	Hamilton Square	New Jersey
John Payne	Bedford	Indiana
Tom Payne	Burlington	North Carolina
Nancy Pearlmutter	Malden	Massachusetts
Nancy Pearlmutter	Miami	Florida
Marcia Pearson	Shoreline	Washington
Vincent Pecchi	Santa Barbara	California
Tanja Pederson	Deer Park	Washington
Karl Peet	Billings	Montana
Debbie Peetz	Rio Linda	California
Kathy Pegg	Levittown	Pennsylvania
Mike Pelaez	Wilmington	Delaware
Tessa Peltier	Vero Beach	Florida
Eliza Pemberton	Raleigh	North Carolina
Susan Pepperwood	Ukiah	California
Brownwen Per-Lee	Arlington	Virginia
Josan Peralas	Salem	Oregon
Rossi Peralta		Mexico
Michelle Pereira	Brasilia	Brazil
Richard Perez	Los Angeles	California
Michelle Perlman	Chicopee	Massachusetts
France Perlman	W Paris	Maine
Nathan Perry	Kensington	New Hampshire
Michael Pesa-Fallon	Brunswick	Maine
Claudia Petaccio	Haddonfield	New Jersey
Featherstone Peter	W. Midlands	United Kingdom
Andrew Peters	Skokie	Illinois
Nancy Petersen	Claremont	California
Heldi Peterson	Milwaukee	Wisconsin
GC Peterson	Fairfield	California
Kimberly Peterson	Cloverdale	California
George Petrisko	Maple Glen	Pennsylvania
carlton Phelps	lakeland	Florida
Patricia Phillips	Kent	Ohio
Kathleen Phillips	Wellington	Florida
Susan Phoenix	Bothell	Washington
Sherri Picket	Ontario	California
Joseph Piecuch	Suquamish	Washington
Eric Piehl	Brighton	Michigan
Jay Pierce	Hazelton	Pennsylvania
Cassandra Pierson	Los Angeles	California
Kay Pierson-Jordan	Ann Arbor	Michigan
C. Piette	Tucson	Arizona
Susan Pilgrim	Central	South Carolina
Laura Pinedo	El Monte	California
Laura Pinnas	Tucson	Arizona
Lisa Pisanic	Germantown	Maryland
Francesy Pisicoli	Calgary	Canada
Brent Pitts	Boise	Idaho
Desirie Pivnick	Parsippany	New Jersey
Scott Plantier	Pittsfield	Massachusetts
Kimberly Plastina	Oak Park	Illinois
Vanessa Plummer	Boulder Creek	California
Ellen Podolsky	Medford	Massachusetts
Lloyd Pohl	Banning	California
Michael Pollack	Cupertino	California
Bev Pollard	Richland	Michigan
Leigh Pomeroy	Mankato	Minnesota
Jackie Pomies	San Francisco	California
Michelle Ponitff	Marrero	Louisiana
Laura Pool	Mount Vernon	Ohio
Frank Porter	Souderton	Pennsylvania
Pat Porter	Yardley	Pennsylvania
Jane Porter	Wenham	Massachusetts
Jacquelyn Potter	Lansing	Michigan
Joel Potter	Houston	Texas
Judi Poulson	Fairmont	Minnesota
Deborah Powell	Pittsboro	North Carolina
Janet Powell	Pontiac	Michigan
Dawn Powell	Malverne	New York
Max Power	Everett	Washington
Wendy Powers	Santa Monica	California
Jenneffer Prajapati	San Jose	California
Kim Pratt	New York	New York
Sara Pratte	Springfield	Ohio
Melissa Preece	Jackson	Michigan
Nora Prentice	New York	New York
Randy Press	Austin	Texas
Yvonne Prete	Brookline	Massachusetts
Peter Price	Shadow Hills	California
Lucy Price	Norwich	United Kingdom
Walter Prim	Attica	New York
Heather Pristash	Beavercreek	Ohio
Melody Pritchard	Marion	North Carolina
Elizabeth Pritchard	Southlake	Texas
Matthew Proehl	San Francisco	California
Guy Prouty, Ph.D	Eugene	Oregon
Tamie Pfyor	Naperville	Illinois
Robert Pfyor	New York	New York
Jennifer Pultz	Raleigh	North Carolina
Deidre Purcell	Troy	New York
Regina Purcell	Gardnerville	Nevada
Cathy Pyle	Widfield	Colorado
Harry Quade	Baltimore	Maryland
Lisa Quartararo	Colonia	New Jersey
Ew Quimbaya-Winship	Rochester	New York
Frederick Quinn IV	Mount Pleasant	South Carolina
Patricia R Hanks	Liberty	North Carolina
Paul R W Anthony	San Clemente	California
Tony Radford	Venice	California
Courtney Ragan	Whiteman AFB	Missouri
Shyla Raghav	Irvine	California
Mary Rahilly	Koloa	Hawaii
Sharghi Rahmanian	Knoxville	Tennessee

Name	City	State/Country
Jim Kahn	Santa Cruz	California
Amit Raikar	Sunnyvale	California
Jessica Rainey	Anderson	South Carolina
Jane Ralls	Minneapolis	Minnesota
R. Ralston	Concord	California
Braden Ramage	Portland	Oregon
Cristina Ramella Pezza	Torino	Italy
Mindy Ramey	Woodridge	New York
Carol Ramos	Ventura	California
Ellen Ramsdale	San Diego	California
David Randall	Port Jefferson	New York
D. Randall	E. Setauket	New York
Robert Rapice	Wolcott	Connecticut
Margaret Raser	San Antonio	Texas
Dick Ray	Citrus Heights	California
Jawanza Ray	Jackson	Mississippi
Pubali Ray Chaudhuri	Newark	California
Tristan Raymond	Ann Arbor	Michigan
Colleen Raynard	Saskatoon	Canada
Bob Razavi	Amherst	Massachusetts
Joe Razo	Santa Barbara	California
Frances Readdick	Jacksonville	Florida
Jerrina Reed	Anchorage	Alaska
Shannon Reed	Murfreesboro	Tennessee
Donna Reeve	North Potomac	Maryland
Sara Regan	Portland	Oregon
Bill Rehm	Carrboro	North Carolina
Russ Reid	Winchendon	Massachusetts
Mark Reif	Winchester	Virginia
Duncan Reilly	Reynella	Australia
Brice Reinhardt-Beltran	Seattle	Washington
Jennifer Reinish	Santa Barbara	California
Margaret Remington	Ridgway	Colorado
Edward Rengers	Woodstock	New York
Dr. Rev. Bryan Thompson	Lisle	Illinois
Angie Revallo	Harbor Springs	Michigan
Teresa Rex	South Jordan	Utah
Carrie Rex	Albuquerque	New Mexico
Jane Rexroat	West Chester	Ohio
Berta Rey	Dapto	Australia
Vanessa Rey Lovejoy	San Francisco	California
Fran Reyes	Los Banos	California
Patrick Reynolds	Lakewood	Washington
Brian Reynolds	Waco	Texas
Lone Rhodes	NYC	New York
Brandi Rice	O Fallon	Illinois
Beth Rich	Deckerville	Michigan
Loretta Richardson	Charlevoix	Michigan
Elaine Richardson	Ashtabula	Ohio
Sandra Richardson	Bloomington	Illinois
Margaret Richardson	White River Jct	Vermont
Heather Richman	santa cruz	California
Roxanne Rick	Milwaukee	Wisconsin
Stephanie Ricketts	Plover	Wisconsin
Linda Ricks	Beaufort	North Carolina
Mark Riddle	Morgan Hill	California
Maggie Ridge	New York	New York
Laurie Rieman	Robbinsville	North Carolina
Leslie Riley	Peterborough	Canada
Monica Riordan	Cincinnati	Ohio
Jesse Ritrovato	West Chester	Pennsylvania
Jennifer Rittenhouse	Minneapolis	Minnesota
Ginger Ritter	Phoenix	Arizona
Amy Ritter	Soquel	California
Diana Rivera	Piscataway	New York
Lauren Roan	Wichita	Kansas
H Roberts	Seaford	Delaware
Eden Robertson	New York	New York
John Robinson	Stone Mountain	Georgia
Keegan Robinson	Chula Vista	California
Misty Rockwell	Hagerstown	Maryland
Jodi Rodar	Springfield	Massachusetts
Jeffrey Rodrigues	Kailua-Kona	Hawaii
Lila Rogers	Hermosa Beach	California
Laura Romag	Spartanburg	South Carolina
Shawn Rorke-Davis	Phoenix	Arizona
Amy Rose	New Delhi	Delaware
Sundae Rosen	Bakersfield	California
Mary Rosenbeck	Jackson Center	Ohio
Sandra Rosenberg	San Jose	California
Julio Rosenblatt	Studio City	California
Heather Rosenfeld	N. Miami	Florida
Carrie Rosenthal	LA WATON	New York
Jeremy Ross	Athens	Oklahoma
Kayla Ross	Geneseo	Ohio
Alexandra Ross	Monterey	New York
Deanna Ross	Lake Forest	California
Regan Rostain	Watertown	Massachusetts
Sandie Rotberg	Las Vegas	Nevada
barbara roth	Chico	California
Richard Roth	Lake Bluff	Illinois
Robin Rotman	Sykesville	Maryland
Darryl Rotrock	Middletown	Ohio
Jennifer Rowland	Sydney	Australia
Jodi Rowley	Tucson	Arizona
Jean Roy	Redwood City	California
Vickie Rozell	Frisco	Texas
Shanna Rozelle	Berkeley	California
Skye Rubin	Tempe	Arizona
Edward Rubino	Alameda	California
Cheryl Rucks	Santa Fe	New Mexico
John Rudberg	Whittier	California
Milton Rudge	Lansdale	Pennsylvania
Rob Rudloff	Gary Ruiz	Sonoma
Gary Ruiz	Easton	Pennsylvania
Elisabeth Ruppel	Versailles	Kentucky
Carrell Rush	Johnson City	Tennessee
Jeni Rushing	St Cloud	Minnesota
Dorothy Russell	Everett	Washington
Jennifer Russell	Jack Russell	California
Jack Russell	Franklin	Louisiana
Rhiannon Russell	Woking	United Kingdom
Robert Russell	Chicago	Illinois
Christina Ruth	Seattle	Washington
Eve Rutzick		

Name	City	State/Country
Bettie Ryan	Stillwater	Minnesota
Jon Ryk	Aurora	Illinois
M S Meyers	Upland	California
D. S. Crafts	Berkeley	California
Sandra Sabatini	Springfield	Massachusetts
Rita Sacks	Leesburg	Florida
N Sahar	Chula Vista	California
Melissa Saldana	Miami	Florida
Mary Salley	Vancouver	Canada
David Sals	Santa Cruz	California
Karen Salzgeber	Parma	Ohio
Jennifer Sanchez	Irving	Texas
Ginger Sanders	Big Lake	Minnesota
Kristin Sands	Wylie	Texas
Josefina Sanfeliu	Brooklyn	New York
Christopher Sanford	Hastings	Minnesota
Kathryn Santana	Los Angeles	California
Michael Santistevan	Phoenix	Arizona
Deborah Santone	San Ramon	California
Sam Santos	Louisville	Colorado
David Saperia	Santa Monica	California
Barry Sapp	McKinney	Texas
Soraja Sarasvati	Eden Prairie	Minnesota
Lloyd Sargent	Elgin	Texas
Darlene Sarver	Cincinnati	Ohio
Dawn Saunders	Patterson	New York
Alex Saunders	Peekskill	California
Edward Scerbo	Boulder	New York
Angela Schaab	Dousman	Colorado
Peggy Schaack	Potomac	Wisconsin
Sandra Schachat	Stow	Maryland
Donna Schall	Countryside	Ohio
Christina Schatmeyer	Chapel Hill	Illinois
Arielle Schechter	St. Pauls Bay	North Carolina
Joseph Schembri	Germantown	Malta
Marvin Scherl	Oakland	North Carolina
Brian Schick	Bristol	California
Eric Schinkel	Boca Raton	Connecticut
Evelyn Schira	San Carlos	Florida
Hermann Schmid	Cape Girardeau	California
Sara Schmidt	Fairfield	Missouri
Cassie Schmitz	San Francisco	Iowa
Erik Schnabel	York	California
Chris Schneider Fenster	Maryland Hts	Nebraska
Thomas Schornog	Normal	Missouri
Christopher Schroeder-Heiermann	Chicago	Illinois
Jim Schuermann	Cupertino	Illinois
Christine Schuetz	Bethel Park	California
Vicky Schulman	Atherton	Pennsylvania
Peggy-Jo Schulte	Chicago	California
Shelley Schultz	Lake Delton	Illinois
Jennifer Schwartz	Redondo Beach	Wisconsin
Jeremy Schwartz	East Meadow	California
Linda Schwarz	Santa Ana	New York
Jason Schwarz	Menlo Park	California
Jonathan Schweiger	Apple Valley	California
Glenda Schweitzer	Manhattan	Kansas
Christopher Scott Brumfield	Baton Rouge	Louisiana
Galen Scott	Takoma Park	Maryland
Johanna Scott	Reseda	California
Niki Scott	Orange City	Florida
Lance Scott	Shaver Lake	California
M Sean Vennett	Tampa	Florida
christopher searles	brooklyn	New York
Amara Sebrosky	Bay Village	Ohio
Dawn Seddon	Clearwater	Florida
Miki Seifert	Pasadena	California
Miyuki Seko	Fountain Valley	California
Dan Semler	Colton	Washington
Bob Semmler	Globe	Arizona
Laura Seraso	La Crescenta	California
Shelly Sernett	Duluth	Minnesota
Marla Serrine	Metamora	Illinois
BernaDette Session	Houston	Texas
Erika Sevetson	Madison	Wisconsin
Max Sezanne	Rome	Italy
Roberto Sgorbati	Milano	Italy
Amar Shah	Claremont	California
Ashley Shake	Louisville	Kentucky
Heather Shanks	Orient	Ohio
Zuriah Shara	Mt. Shasta	California
Deepti Sharma	Ypsilanti	Michigan
Charity Sharp	Jacksonville	Florida
Erika Shea	Waterloo	Canada
Johanna Sheinkin	New York	New York
aron sheivs	brooklyn	New York
Paul Sheldon	Sausalito	California
Barbara Shenton	NY	New York
Williamson Sherry	Mill Valley	California
Staci-lee Sherwood	Bloomington	New York
Arron Shevis	brooklyn	New York
Amy Shields	Birmingham	Alabama
Tamiko Shieri	Ontario	Oregon
Betty Shipley	Crystal River	Florida
Noelle Shipman	Portland	Oregon
Duane Short	Metropolis	Illinois
Lynn Shumway	Tempe	Arizona
Darice Shumway	Hastings	Michigan
Christiaan Siano	Austin	Texas
Ellen Siciliano	Des Plaines	Illinois
toni siegrist	Cambridge	Massachusetts
Ruth Siekevitz	New York	New York
Annette Sierak	West Palm Beach	Florida
Scott Sillett	Silver Spring	Maryland
Briana Silva	Waianae	Hawaii
Lin Silvan & Family	Coeur d'Alene	Idaho
Tana Silverland	Mission Viejo	California
Seth Silverman	New York	New York
Barre Simmons	Springfield	Virginia
Klaus Simon	Frankfurt	Germany
John Simonian	South Bend	Indiana
Adrie Sims	Amherst	Massachusetts

Name	City	State/Country
Melanie Sinclair	Austin	Texas
Viriam Singh	Temecula	California
Diana Singleton	Glendale	California
Douglas Sittler	Rockledge	Florida
Paula Sjunneson	Seattle	Washington
Neal Skakel	Blairsville	Pennsylvania
Michelle Skinner	Panama City	Florida
Kate Skinner	Montreal	Canada
Jonathan sklar	Los Angeles	California
Shelly Skoog-Smith	Goleta	California
Kevin Slaboda	Burlingame	California
amy slack	minden	Louisiana
Stephen Sloane	Washington	District of Columbia
Christopher Smeiglin	Quincy	Massachusetts
Sarah Smiley	Burbank	California
Deborah Smith	Oklahoma City	Oklahoma
Ben Smith	Brooklyn	New York
Joyce Smith	Momence	Illinois
Bill Smith	Prior Lake	Minnesota
Terrence Smith	Sugar Loaf	New York
Stephanie Smith	Arlington	Texas
Ryan Smith	St. Croix	Virgin Islands
Brandon Smithwood	Concord	Massachusetts
Jyllian Smolev	White Plains	New York
Larry Snyder	Drexel Hill	Pennsylvania
Marilee Snyder	Michigan City	Indiana
Sarah Snyder	Beaver Falls	Pennsylvania
Erica Solie	Garden Grove	California
Mitchell Solovay	Brooklyn	New York
Meghan Somerville	Orangeville	Canada
Daphne Somkin	Berkeley	California
Catherine Sommer	San Francisco	California
Jill Sonia	Dover	New Hampshire
Kathryn Sonnen	Washington	Pennsylvania
Shawnee	Donna Sonnenberg	Pennsylvania
Becky Sonstrom	Edgerton	Wisconsin
Michelle Sorensen	New York	New York
Linda Sotis	Hillsdale	New York
Joanna Soto-Aviles	Caguas	Puerto Rico
Sandee Sousa	Miami	Florida
Priscilla Sowa	Vernon	New Jersey
Rita Sowles	Kansas City	Missouri
Steve Spacek	San Marcos	Texas
Jane Spaeth & Steven Slagle, MD	New Braunfels	Texas
Nancy Spears	Bossier City	Louisiana
Jeremiah Spence	Austin	Texas
Pat Spencer	Alameda	California
Ellen Spencer	Brooklyn	New York
Jason Spiegel-Grote	Brooklyn	New York
Eric Spielman	Pleasant Plains	Illinois
Monica Spisar	Ann Arbor	Michigan
Kate Spoot	baltimore	Maryland
Richard Spotts	Bayport	New York
Patricia St. August	Okanogan	Washington
Bethany Staelens	Long Island City	New York
Karen Stamm	New York	New York
Kimberly Stamp	Albuquerque	New Mexico
Lynne Stanford	Canyonlake	Texas
Robert Stanton	Hoffman Estates	Illinois
Charles Stanyan	San Francisco	California
Dawn Stanzione	Barrington	Rhode Island
Betty Stapp	Los Alamitos	California
Day Starr	Phoenix	Arizona
Melissa Statman	Meadville	Pennsylvania
Karen Steele	Eureka	California
Brandi Steele	Lanett	Alabama
Joseph Stegner	Gainesville	Florida
Theresa Stehura	Glendale	California
Daniel Stehura	Glendale	California
Sandi Steidl	Albuquerque	New Mexico
Lora Steiner	Willits	California
Heather Steinmann	New Brighton	Minnesota
Dusty Stepanski	Richwood	New Jersey
Glen Stephens	Princeton	Illinois
Donald Stevens	winter park	Florida
Christine Stevens	Tacoma	Washington
Russell Stevens	New Boston	Texas
Candice Stevens	Silver Springs	Florida
jeanette stewart	falls church	Virginia
Nzingha Stewart	Brooklyn	New York
Velda Stewart	Ogden	Utah
Sharon Stewart	Rockledge	Florida
Alexa Stickel	miami	Florida
Theresa Stiith	Glenpool	Oklahoma
Denese Stokes	Big Bear City	California
B.E. Stoll	Tampa	Florida
Deborah Stone	Birmingham	Alabama
Sarah Stone	Camas	Washington
Shon Stone	Nicholasville	Kentucky
George Stone	Milwaukee	Wisconsin
Meredith Stone	Philadelphia	Pennsylvania
J Stover	Hill City	Kansas
Cyndi Stover	Paradise	California
Jessica Strick	Mt. Holly	New Jersey
Chris Striegel	Philadelphia	Pennsylvania
Eric Stromberg	Davis	California
Aimee Strouse	Sellerville	Pennsylvania
Andrianna Stuart	College Park	Maryland
Dr. Stuart&Judith Block	Bronx	New York
Harriet Stucke	Philadelphia	Pennsylvania
Mark Stuckenbruck	Livermore	California
Jeff Stutsman	Grand Rapids	Michigan
Denise Stutts	Upper Black Eddy	Pennsylvania
Kevin Suedmeyer	Columbia	Missouri
Dorothy Suggs	LaGrange	Georgia
Lawrence Sullivan	Belmont	Massachusetts
Paula Summers	Fair Oaks	California
Lawrence Sutton	Staten Island	New York
Jessica Swadosh	Southwick	Massachusetts
Jessica Swain	Turnersville	New Jersey
Linda Swanson-Davies	Portland	Oregon
Elizabeth Swartwood	La Mesa	California
Tony Swartz	Mesa	Arizona
Anne Swasey	Rochester	New York
Jemma Swafek	Greensboro	North Carolina

Name	City	State/Country
Mandy Swearingen	Mira Loma	California
Aileen Sweeney	Manhattan Beach	California
Karin Swelling	Albuquerque	New Mexico
Micci Swick	Winston Salem	North Carolina
Ann Swigart	Cincinnati	Ohio
Gail Swope	Crofton	Maryland
Gretchen Szostak	Montecito	California
Claudia T.	orangutans	Mexico
Deanna Tachna	Birmingham	Michigan
Samantha Tackett - Cox	Elizabethtown	Indiana
Carla Tam	New Haven	Indiana
Len Tamm	Albuquerque	New Mexico
Sarina Tanner	Sanford	Florida
Carole Tante	Mabelvale	Arkansas
heather taylor	Jacksonville	North Carolina
Adrian Taylor	Chapel Hill	North Carolina
Julie Taylor	Greensboro	North Carolina
Ceres Taylor	Lacrosse	Wisconsin
Robert Taylor	Hillsborough	North Carolina
Laurn Taylor	San Mateo	California
Kim Taylor	Del Mar	California
Marjike Teirlinck	Somerset West	South Africa
Eddy Telemaque	Leicester	Massachusetts
P. Tellekamp	New London	Connecticut
Lisa Tener	Saunderstown	Rhode Island
Theresa Terhark	Cottage Grove	Minnesota
DR. Terrance Hutchinsont	California City	California
Maria Therese	Lincolnwood	Illinois
Megan Thielking	Syracuse	New York
Thomas Thiss	Excelsior	Minnesota
Allen Thomas	fallbrook	California
John Thomas	Cecil	Pennsylvania
Ron Thompson	Cortlandt Manor	New York
Steven Thompson	Nashville	Tennessee
Elicia Thompson	Decatur	Georgia
Stephen Thompson	Kalaheo	Hawaii
Jane Thorngren	Ramona	California
Lauren Throop	Lander	Wyoming
Renee Tiesler	New York	New York
Peter Tiffany	Fallon	Nevada
Dawn Tiffin	Milwaukee	Wisconsin
Coby Tissington	Alderson	Oklahoma
Edward Todd	Roanoke	Virginia
Alexandra Toledo	Galt	California
Geri Tomat	Lyndhurst	New Jersey
April Tomikel	Corry	Pennsylvania
Mark Tomlinson	Cary	Illinois
Jean Tompkins-Welch	Ypsilanti	Michigan
Ann Torns	Spartanburg	South Carolina
Lisa Tonerelli	Freeport	New York
Jay Toney	Richmond	Indiana
Josep Tordera	Cambridge	Wisconsin
Sam Torello	Hudson	Florida
Jeff Tornheim	Walnut Creek	California
Robert Torricelli	Washington	District of Columbia
Kim Tostenson	Evansville	Minnesota
Keith Totherow	Conover	North Carolina
Susan Tower	Fairway	Kansas
Kayla Tracey	Taos	New Mexico
Jackie Travers	Greenlawn	New York
Laura Tregoning	Eureka	California
Cory Trembath	Troy	New York
Melissa Trent	Dayton	Ohio
Tia Triplett	Los Angeles	California
L.J. Triska	Honolulu	Hawaii
Alex Tsouvalas	Woburn	Massachusetts
Johnson Tsui	Staten Island	New York
Ron Tuason	Boulder	Colorado
George Tucker	Hollywood	Florida
Clare Tucker	Eugene	Oregon
Robert Tull	Medford	Oregon
Michael Tuma	San Diego	California
Andreas Turanski	New York	New York
Tina Turbeville	Nashville	Tennessee
Elizabeth Tures	Union	Illinois
Aaron Turkewitz	Chicago	Illinois
Samuel Turner	Santa Maria	California
Loma Turner	San Bernardino	California
Jason Turner	Greenville	North Carolina
John Tyler	El Grenada	California
Charlene Ungstad	Sacramento	California
Cindy Unruh	San Leandro	California
David Uozumi	New York	New York
Carlos V. Climent	Miami	Florida
Matthijs Vader	Alphen aan den Rijn	Netherlands
Joshua Valencia	Hemet	California
Vivian Valentin	Santa Barbara	California
Andrea Valenzuela	benicia	California
Sophie Valke	Toulouse	France
Cheryl Vallone	Ashland	Massachusetts
Adrian Van Dellen	Woodville	Texas
Betty Van Wicklen	Waterviet	New York
Julia Van de Grift	Madison	Wisconsin
Andrea Van Liew	Williston	Vermont
Donna Van Bloemen	Santa Monica	California
Patricia Van Dyke	Belton	Texas
Daniel Van Luvender	Nashope	New Jersey
Reba Vanderpool	Half Moon Bay	California
Nicole Vanderwyst	Vancouver	Canada
Willow VanLeenhoff	Leiden	Netherlands
Bobbie Vanover	Gallipolis	Ohio
Karen Varney	Oakland	California
Nancy Vasiloff	Somerville	Massachusetts
Dashielle Vawter	san diego	California
Milton Vega	Jacksonville	Florida
Alberto Vera	Roseville	California
Stephanie Verhulst	Menomonee falls	Wisconsin
Evelyn Verrill	Prescott	Arizona
Joeni Verschaeve	Jalisco	Belgium
Ihan Verschuur	Omaha	Nebraska
Izzy Verschuur	Omaha	Nebraska
Claudia Vetesy	Boise	Idaho
Garth Viennneau	Lewis Lake	Canada

Name	City	State/Country
Cheryl Vigoda	Coconut Creek	Florida
Fernando Villegas	Santiago	Chile
Michelle Villeneuve	Long Beach	California
R. Vincent Bradley	College Park	Maryland
Jaclyn Vinick	Arcata	California
Kay Virago	Seattle	Washington
Barbara Vitale	Long Beach	New York
Laura Vlk	Goleta	California
Susan Voll	Jamaica	New York
Beth Volpe	Brockton	Massachusetts
Robert von Tobel	Bellevue	Washington
Robert vonGiebel	Belvidere	New Jersey
Katie Vore	Ocoee	Florida
Demetria Vorters-Leggett	Atco	New Jersey
Barbara Voss	Woodland Hills	California
Jessie Vosti	Austin	Texas
Corina Wachter	Arcata	California
John Wade	Huntsville	Alabama
Mary Waff	Edenton	North Carolina
Leslie Wagner	Houston	Texas
Vickie Wagner	Three Oaks	Michigan
Stacey Wagner	Warren	Michigan
Linda Waine	Taunton	Massachusetts
Donna Walcott	Port Huron	Michigan
Wanda Walczak	Huntington	West Virginia
Garry Walczewski	Rossford	Ohio
Jo Waldron	Everett	Washington
Charlotte Wales	Leslie	Arkansas
Katherine Walker	Hollywood	California
Matt Walker	Atlanta	Georgia
Lisa Wallace	Winston-Salem	North Carolina
Susie Wallace	Lincoln Park	Michigan
John Wallack	Fort Bragg	California
Julie Waller	Winter Park	Florida
Chris Wallraff	Los Angeles	California
Sarah Wallus	St. Louis	Missouri
Emily Walsh	Santa Barbara	California
Crystal Walter	Wichita	Kansas
Stacey Walter	Holbrook	Arizona
Kristin Walter	Sugar Land	Texas
Jen Walters	Louisville	Kentucky
Laura Waltrip	Winter Springs	Florida
Cong Wang	Mason	Ohio
Laura Ward	Los Angeles	California
John Wardell	Santa Clara	California
Stephanie Warner	Portsmouth	Ohio
Donna Warner	Coos Bay	Oregon
Matt Wamke	Santa Fe	New Mexico
Roxanne Warren	New York	New York
Jan Warren	Camden	Maine
Tom Warwick	Auburn	California
Meredith Waterloo	Dexter	Michigan
Catherine Waters	Baltimore	Maryland
Gary Waters	LAKE WALES	Florida
Alan Watson	Mims	Florida
Deborah Watson St. James	Martinsburg	West Virginia
Deira Watson	Bethesda	Maryland
Susan Watson	Orinda	California
Shaye Watson	Carrollton	Texas
Barb Watts	Louisville	Kentucky
Heath Watts	Missoula	Montana
Peter Waymire	San Francisco	California
Melissa Wayne	Philadelphia	Pennsylvania
Robin Weare	Long Beach	California
Jeffrey Weber	Sarasota	Florida
Diana Weber	Albany	New York
Paul Webster	Salt Lake	Utah
Jeanne Wehrhahn	Dixfield	Maine
Steve Weigner	Seattle	Washington
Stacey Weinberger	Oakland	California
Angela Weller	Clermont	Florida
Mark Wells	Des Moines	Iowa
Frances Werle	John's Island	South Carolina
Danielle Werner	Eugene	Oregon
Gretchen Wernersbach	St. Paul	Minnesota
Lisa-Marie West	Foster City	California
Marie Westhoyer	Deltona	Florida
Helene Whalen	Novi	Michigan
Barbara Wharton	La Jolla	California
Vickie Whitacre	York	Pennsylvania
Lois White	Grants Pass	Oregon
Susan White	Albuquerque	New Mexico
Tracey Whittington	Charleston	West Virginia
John Whitman	Wellesley	Massachusetts
Betty Whitmer	Vancouver	Washington
Kathy Whitmoyer	Bloomsburg	Pennsylvania
Beth Whitney	Sausalito	California
Cathie Whitt	Columbus	Ohio
Wendy Whitten	South Elgin	Illinois
Christie Whyland	Fort Lauderdale	Florida
Sandra Wiatrowski	High Springs	Florida
Jodie Wiederkehr	Chicago	Illinois
David Wigder	Bronx	New York
Gregory Wilcox	Candler	North Carolina
Shari Wildschutte	Concord	California
Catherine Wiley	Philadelphia	Pennsylvania
Paul Wilkins	Santa Fe	New Mexico
Konner Williams	Kingston	Colorado
Taffy Williams	Tuckahoe	New York
Fran Williams	Atlanta	Georgia
Stacie Williams	New Braunfels	Texas
Paul Williams	MOSINEE	Wisconsin
Patricia Williams	Boca Raton	Florida
David Williamson	Canton	Michigan
Seanna Willimas	Orem	Utah
Jen Willis	LA	California
Dana Willis	Winona	Minnesota
Kelly Willow	Mifflintown	Pennsylvania
Rita Wilson	Bethel Springs	Tennessee
Barbara Wilson	Great Neck	New York
Susan Winsberg	Los Angeles	California
Nancy Winters	Hermosa Beach	California
Ralph Wissing	Cincinnati	Ohio
Charley Wittman	Allentown	Pennsylvania
Richard Woerpel	Simi Valley	California

Name	City	State/Country
Stephen Wogan	Austin	Texas
Rachel Wolf	Santa Cruz	California
Robert Wolf	Naples	Florida
White Wolf Woman	Ripton	Vermont
Twyla Wolfe	Stoughton	Massachusetts
Margot Wolff	Zwolle	Netherlands
Ben Wollman	Racine	Wisconsin
Ken Wong	manhattan	New York
Simon Wood	Coffs Harbour	Australia
Erik Wood	New York	New York
Rachel Woodard	Ridgecrest	California
Trish Woodard	Shawnee	Oklahoma
Valerie Woodson	Buffalo Grove	Illinois
Megan Woodworth	Beverly	Kentucky
Lori Worrester	East Haven	Connecticut
Jeffrey Workman	Pittsburgh	Pennsylvania
Heather Wright	Milford	Michigan
Wendi Wright	Levittown	Pennsylvania
Michelle Wright	New Castle	Delaware
Cathryn Wright	Stoughton	Wisconsin
Andy Wurl	Atlanta	Georgia
Candy Wurster	Franklin	North Carolina
Dorothy Wyatt	Newburgh	Indiana
Amanda Yaggy	Chapel Hill	North Carolina
Michelle Yakel	Turtle Creek	Pennsylvania
Steve Yakoban	Englewood	New Jersey
Naoko Yakota	Osaka	Japan
Mario Yanez	Miami	Florida
Natasha Yannacanedo	New York	New York
Cindy Yates	Wilmington	North Carolina
Delaine Yates	Los Angeles	California
Dafna Yee	Piano	Texas
Drew Yerkes	Shorewood	Wisconsin
Krystal Ying	Norwalk	California
Logan Yonavjak	Chapel Hill	North Carolina
Ana Yong Soler	El Paso	Texas
Emily Young	Ephrata	Pennsylvania
Pamela Young	San Diego	California
Carla Young	Lawrence	Kansas
Elaine Yu	Fremont	California
Peter Zadis	Walnut Creek	California
Jackie Zafaratos	Massepequa	New York
Kerri Zajicek	Hyattsville	Maryland
Ethan Zamonski	Glen Rock	New Jersey
Judith Zarin	Dolgeville	New York
Brook Zelcer	Westwood	New Jersey
Rose Zellers	Albuquerque	New Mexico
Raleigh Zellers	Albuquerque	New Mexico
Art Zernis	Rego Park	New York
Marian Zimmerman	Biddeford	Maine
James Zizzo	Wilmington	North Carolina
Ethan Ziomke	Madison	Wisconsin
Marilyn Zoratti	Palm Springs	Florida
Glen Zorn	Everett	Washington
Kelly Zurliein	Kearney	Nebraska